

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Stratford School District

Agency Code: 375628

Review Date(s): April 10-11, 2019

School(s) Reviewed: Stratford High School

Date of Exit Conference: April 11, 2019

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at a nominal charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin [DPI School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training) (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin [DPI GOALS webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- Wisconsin Team Nutrition is hosting a Teaming Up to Increase Participation workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop) (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Stratford School District for the courtesies extended to us during the on-site

review and for being available to answer questions and provide additional information. All were very

receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The DPI review team appreciates the eagerness of the staff at Stratford School District for their willingness to make changes to meet school meals program regulations.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- ✓ All free and reduced price meal applications are approved and denied correctly
- ✓ All meal eligibilities are accurately transferred to the Benefit Issuance (BI) list

Technical Assistance:

- A BI list should only contain students with meal eligibility benefits, not paid meal price students.
 - Income on applications should only be annualized by the Determining Official (DO) if there are multiple income frequencies utilized by a household (weekly, bi-weekly, monthly, twice per month).
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Verification

Commendations:

- ✓ Verification was completed by November 15 and all notification letters were sent to households within appropriate timeframes

Technical Assistance:

- The Determining Official (DO) makes the initial *determination* of a free and reduced meal application's eligibility. The DO then signs the back of the application; this is the date recorded on the BI list. Come time for Verification, the Verifying Official (VO) will select the applications to be verified, and then passes them to the Confirming Official (CO) to *confirm* the initial determination. The VO and CO both sign the back of the applications selected for Verification.
 - The DO and CO cannot be the same person; the DO and VO can be the same person.
 - **Please ensure that the officials on the online contract are in fact the individuals completing these roles on site.**
- "Error-prone applications" are those with reported income within \$100 monthly or \$1,200 yearly of the free and reduced price income eligibility levels.

Resources:

- Please reference the different Verification sampling methods within the [Verification Forms Packet](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).
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Meal Counting and Claiming

Commendations:

- ✓ The Point of Service (POS) system produces accurate counts
- ✓ Monthly edit checks are completed

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ **Finding #1:** The high school's and middle school's NSLP and SBP counts on the monthly claims have been transposed. The number of meals reported and by category are accurate, and therefore, reimbursement for the meals was not incorrect. But this is a systemic issue.

Corrective Action Needed: Please amend the review period's claim (March) and submit a statement explaining how this will be prevented going forward.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Comments/Technical Assistance/Compliance Reminders

Week of Review (March 4-8, 2019)

March 4-8, 2019 was chosen as the week of review to determine meal pattern compliance. Stratford High School students have the option to eat lunch at the Elementary school building or at the Middle/High School building. The Elementary school offers hot entree items, whereas the Middle/High School building provides all cold, grab n' go options that some of which can be made into reimbursable meals.

Breakfast at the Elementary School - there were no meal pattern violations

Breakfast at the Middle/High School - there were no meal pattern violations

Lunch at the Elementary School - the grain-based dessert limit of 2 oz eq was exceeded. 3 oz eq was offered over the course of the week.

Lunch at the High School – the following meal pattern violations were found: daily and weekly fruit shortages, daily and weekly vegetable shortages, daily and weekly meat/meat alternate shortages, daily and weekly grain shortages, missing vegetable subgroups and a vegetable subgroup shortage. The daily and weekly grain shortages and the daily and weekly meat/meat alternate shortages are considered repeat findings (they were found at the previous administrative review for school year 2014-15) and will be subject to fiscal action.

Lunch at the High School building

- Daily fruit shortage
 - Production records do not indicate a serving size for fruits, therefore reviewer not able to verify that the correct amounts were offered to students. This is why it is considered a shortage.
- Weekly fruit shortage
 - Due to the inability to determine daily fruit amounts.
- Daily Vegetable shortage
 - Production records do not indicate a serving size for vegetables, therefore reviewer not able to verify that the correct amounts were offered to students. This is why it is

considered a shortage. Some meal kits did contain the correct portion of vegetables, but not every student had access to them.

- Weekly vegetable shortage
 - Due to the inability to determine daily vegetable amounts.
- Daily meat/meat alternate shortage.
 - Nachos kit only contained 1 oz eq meat/meat alternate. In order to count it as a full component for high school students the meat/meat alternate component must credit at least 2 oz eq meat/meat alternate.
 - Wrap kit only contained 1.5 oz eq meat/meat alternate. In order to count it as a full component for high school students the meat/meat alternate must credit at least 2 oz eq meat/meat alternate.
 - Production records did list that other meat/meat alternates were offered, but it was unclear as to what days they were made available and whether or not students selecting these entrees had access to them.
- Weekly meat/meat alternate shortage
 - Due to daily meat/meat alternate shortages.
- Daily grain shortage.
 - Salad kit did not contain any grains.
 - PBJ kit only contained 1 oz eq grains.
 - Chicken salad kit only contained 1.75 oz eq grains.
 - Wrap kit only contained 1.5 oz eq grain.
 - Production records did list some other grains were offered, but it was unclear as to what days they were made available and whether or not students selecting these entrees had access to them.
 - In order to count a grain as a full component for high school students the product must credit at least 2 oz eq grain.
- Missing vegetable subgroups (dark green, beans/peas/legumes, starchy and other)
 - Carrots are the only vegetable listed on production records. The salad meal kit did offer some tomatoes and cucumber slices however, these would not be available to other students to select. All vegetable subgroups must be offered and available to all students. Refer to the [lunch meal pattern table](#) for specifics.
- Vegetable subgroup shortage (red/orange vegetables)
 - Carrots are the only vegetable that was listed on production records as offered to students outside of the meal kits, however it was unclear as to what days they were offered and how much was available to students.

Going forward, switch to using daily production records instead of recoding on a weekly basis (consider using the School Nutrition Team's [production record templates](#)). In this way, it will be much clearer as to what food items were offered every day. In addition, be sure to have a planned serving size for every item that you offer.

Additionally, as for meal kits. Since these are meant to be a complete reimbursable meal, they must contain 3 full components, with one of them being at least a ½ cup fruit or vegetable. Reviewer recommends creating kits that contain 2 oz eq grain, 2 oz eq meat/meat alternate and ½ cup fruit or vegetable. There must also be a milk variety available to choose from and additional vegetables and fruit that students may select, as they must have access to at least 1 cup fruit and 1 cup vegetable daily.

Grain-Based Desserts - at Lunch

During the week of review at Stratford High School (March 4-8, 2019) for meals served at the

Elementary School, graham crackers (1 oz eq grain) were offered three out of the five days. Over the course of the week, 3 oz eq of grain-based desserts were offered. No more than 2.0 oz eq grains served per week in the NSLP may be in the form of a grain-based dessert. Refer to USDA's [Whole Grain Resource](#) for more information.

It was noted that the graham crackers were served with the chicken nugget entrees, however, on Tuesday March 5th, a breadstick was also provided with this meal. If a student were to select the nuggets (five nuggets provides 1 oz eq grain) and a breadstick (1 oz eq grain) they would have the required minimum grain of 2 oz eq grain. In this case, the graham crackers were not needed.

For taco day, consider switching to a larger tortilla so that each tortilla will credit as 2 oz eq grain. In this way, you will not need to offer the graham crackers on the side to reach the High School daily minimum. This will also make Offer versus Serve easier for students and staff. Currently, if students select the tortilla (1.75 oz eq grain) they must also select the graham crackers (1 oz eq grain) to ensure they have met the daily minimum for grain in order to consider the food choice a full component.

Salad bar

Produce on a salad bar can credit toward the meal pattern each day that it is offered to students (e.g., if black beans are offered daily with a planned serving size of 1/8 cup, then 5/8 cup has been offered in total each week and meets the minimum 1/2 cup requirement of beans/peas).

Even with salad bars, the menu planner must plan a specific portion size that he or she intends students to take. If the fruits or vegetables on the salad bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as 1/2 of the volume served.

Additional signage on a salad or salad bar can assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a [Salad Bar Signage Template](#) with pictures that can be posted on a salad or salad bar. This resource is found on our [Signage](#) webpage at the bottom of the page (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Additionally, add appropriate serving utensils for each item offered. Fruits and vegetables are credited by volume (cups), therefore please use spoodles, which are appropriate serving utensils (kitchen spoons and tongs do not measure a standardized volume and therefore are not appropriate utensils for use on the salad bar). Spoodles are also available with slots for food items that are served in juice or liquid.

Continue to document all foods served on the salad bar and update serving sizes to at least a 1/8 cup for fruits and vegetables. You may consider using one of DPI's production record templates available on the [Production Records](#) webpage, under the Other Resources heading. The DPI salad bar template also has a place to document condiments, which were frequently written in the margins of the production records currently in use. (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Production Records

Production records are required as documentation that your school is serving reimbursable meals that

contain all required meal pattern components. Stratford School District does have production records for the foods served to all students (including High School students) out of the Elementary school building; however, the production records for the foods offered at the Middle/High School building were incomplete. All menu options must be documented, with all [required information](#) so that it is clear what is offered at the Elementary school building and what is offered at the Middle/High School building.

Please review the [production record requirements](#) checklist and ensure that the Elementary School and Middle/High School production records include all of this information. You may choose to use one of DPI's production record templates, which can be found on our [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Other production record requirements:

- Be specific on production records about the identity, brand, and description of the items served. For example, instead of "snacks", list what type of graham cracker was served.
- Fruit sizes (e.g. case count) should also be recorded. It is helpful to include not just portion size, but also crediting, on the production records.
- Breakfast production records need to record number of meals planned and served, number of reimbursable and non-reimbursable meals (adults meals) served, planned serving sizes for all menu items, the site name (Elementary School or Middle/High School building) and age/grade grouping served.
- Milk was not being tracking on production records. Milk was being tracked on a separate sheet of paper, however only the amount of milk that was available at the beginning of the week and again at the end of week was recorded. It was aggregate data that included all lunch, breakfast and snack milks for grades K-12. Another sheet to track milk was in use for the milks served at the Middle/High School building on a weekly basis.
 - While it is good that you are tracking milk, this data does not provide the all the details needed. Daily milk usage by type must be tracked on production records or a milk recipe must be used. Even with a milk recipe, total milk usage must be recorded daily on production records. Breakfast, lunch and snack milks must all be recorded separately.
 - A [Milk Recipe](#) is documentation of average milk usage by meal (breakfast or lunch) and grade group. A recipe would be needed for the Elementary school and the Middle/High School. When a milk recipe is on file, total milk usage must still be recorded on production records. Milk recipes must be updated twice per year or when you notice that students' preferences have changed (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc>)

Standardized Recipes

Use of standardized recipes is another important part of USDA School Meals Programs. Anytime two or more ingredients or food products are combined together, a standardized recipe must be made. This includes grab n' go options at breakfast and lunch.

Technical assistance was provided for the recipe standardization process. Recipe standardization ensures that each meal is consistently planned to meet the daily and weekly requirements. As discussed onsite, the breakfast and lunch grab n' go options need to have a recipe with instructions for

how to assemble the containers correctly, no matter who is preparing them. Additionally, since sometimes the containers are intended to contain a reimbursable meal without the student having to select any other meal component, the container should contain at least three full components, one of which is a ½ cup of fruit, vegetable or a combination of fruit and vegetable. The definition of a full component is the daily minimum requirement for High School students, which are 1 cup fruit, 1 cup vegetable, 2 oz eq grain, 2 oz eq meat/meat alternate and 1 cup milk. For simplicity of making the grab n' go containers, it is recommended that each one contain at least 2 oz eq grain, 2 oz eq meat/meat alternate and a ½ cup of fruit, vegetable or a combination of the two. The students must still have access to at least a full cup of fruit and vegetable apart from the grab n' go container. Remember that Offer vs. Serve defines what must be on a student's tray to be considered a reimbursable meal and is separate from what you must offer to students as defined in the [Meal Pattern](#).

Use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the [Standardized Recipes](#) webpage. We encourage viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process.

Offer versus Serve

Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch and breakfast, specifically at the Middle/High School building where there are more a la carte options. At lunch, one student selected a cottage cheese cup (1 oz eq meat/meat alternate), a cheese stick (1 oz eq meat/meat alternate) and a bag of carrots (½ cup vegetable) and this meal was marked as reimbursable. This is not considered a reimbursable meal because the student only selected two full, different components (meat/meat alternate and ½ cup vegetable), instead of the required three components.

In summary for OVS, the school must OFFER the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal at lunch. From these offerings, students must SELECT at least three full, different, food components, one of which is ½ cup fruit and/or vegetable. As a reminder, students do not have to take milk.

Additionally, the food service director should encourage staff to prompt students to create a reimbursable meal from the a la carte choices available at the Middle/High School building. This could be as simple as encouraging students to select a ½ cup fruit or vegetable. These prompts can go a long way to help students select reimbursable meals.

It is important for staff to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](#) and the [Offer Versus Serve Webcast](#) can be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts>).

Training

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification,

free/reduced meal applications, meal pattern, crediting, smart snacks and record keeping requirements. Travel/meal expenses are allowable food service expenses.

The 2019 School Nutrition Skills Development Courses (SNSDC) dates and locations have been released:

- Appleton (Fox Valley Technical College): July 16-18, 2019
- Milwaukee (Alverno College): July 23-25, 2019
- Rice Lake (Wisconsin Indianhead Technical College): July 30-August 1, 2019
- Middleton (Kromrey Middle School): August 6-8, 2019
- Wausau (Northcentral Technical College): August 13-15, 2019

Registration and class schedules will be posted to the website in early May. Please visit the [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage for more information (<https://dpi.wi.gov/school-nutrition/training#up>).

Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts](#) webpage.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding #2: Grain-based desserts at lunch exceeded 2 oz eq for the week of review (March 4-8, 2019) on the Elementary School service line.

Corrective Action Needed: Submit a statement that says how you will ensure that the grain-based dessert limit of 2 oz eq will not be exceeded in the future. Additionally, state what you would do differently to the week of review to correct the overage.

Finding #3: Salad bar production records missing planned serving size for many items. Consider using our DPI [salad bar template](#), which also has space to document condiments.

Corrective Action Needed: Submit one week of completed salad bar production records. Be sure to include planned serving sizes for all options.

Finding #4: Incomplete lunch and breakfast production records.

Corrective Action Needed: Have staff responsible for filling in production records watch the [Production Record webcast](#) (15 minutes). Submit a log with the time, date and the name(s) and signature(s) of those in attendance.

In addition, submit one week of completed production records, for both breakfast and lunch, for both the Elementary and the Middle/High School. Review the technical assistance section in this report for what to include and review the [production record requirements](#) checklist to ensure the submission includes all required information. If you choose to create a [milk recipe](#), include that, as well. DPI [production record templates](#) are available for use, although not required. You may select a week of your choosing, after the administrative review and before the corrective action due date.

Finding #5: the following meal pattern violations were found at the high school building: daily and weekly fruit shortages, daily and weekly vegetable shortages, daily and weekly meat/meat alternate shortages, daily and weekly grain shortages, missing vegetable subgroups and a vegetable subgroup

shortage. The daily and weekly grain shortages and the daily and weekly meat/meat alternate shortages are considered repeat findings (they were found at the previous administrative review for school year 2014-15) and will be subject to fiscal action.

Corrective Action Needed: submit a statement that explains your plan how to fix the abovementioned meal pattern violations at the high school building. Include details about how you will ensure all students have access to at least 1 cup of fruit and 1 cup of vegetable daily. Describe how you will make sure that all vegetable subgroups will be offered over the course of the week. Explain how you will adjust the meal kits (salad kit, pbj kit, chicken salad kit, nachos kit and wrap kit) in order to contain enough meat/meat alternate and grains in order to be able to count them as full components. Confirm that you will include planned serving sizes on all foods offered. Include any training plans for staff so that they are aware of these requirements.

☐ **Finding #6:** Additional training required on Offer vs. Serve (OVS) for point of service staff determining reimbursable meals.

Corrective Action Needed: Have staff responsible for determining reimbursable meals obtain additional OVS training. Please watch the following webcasts and submit a log that states the name of the webcast, the date it was viewed and include the name(s) and signature(s) of those in attendance.

- [Offer versus Serve webcast](#) (30 min)
- [Meal or No Meal: Offer versus Serve Lesson and Game](#) (30 min)

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

3. SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

Review of the a la carte items for sale at the Elementary School revealed that the following items do not meet Smart Snack standards:

- Super Bakery mini powdered sugar donut - exceeds calories and sodium
- Mini chocolate donut - exceeds calories and sodium

The Middle/High School building has beverage and snack vending machines. The vending machines are located in a commons area; however, Middle School students only use that space during meal times. High School students use that space for other activities other than meal times. Currently, the beverage vending machine states that the machine is turned off during Middle School lunch only. Since there are beverages that are not allowed for Middle School students, the signage must be updated to state that it will also be turned off during breakfast meal times. Additional signage must be added to communicate to students that the beverage machine is for High School student use only.

When a school chooses to sell foods or beverages during the school day, these food options must meet the Smart Snacks standards and documentation must be kept on file that proves the compliance of the items. This includes nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. In addition, it is also helpful to keep printouts of the results page from the [Smart Snacks calculator](#).

Of the documentation available to review (not all product information was documented), many of the snacks offered in the vending machine are not compliant with Smart Snacks regulations. A product must meet one of the general standards: be whole grain rich, have a fruit, vegetable, dairy product, or protein food as the first ingredient, or be a combination food with at least $\frac{1}{4}$ cup fruit and/or vegetable. The following items in the snack vending machine are not compliant:

- Goldfish – not whole grain-rich and >200mg sodium
- Original Trail Mix – contains added fat (oil)
- Black Forest fruit snack – first ingredient is corn syrup, followed by sugar (does not meet the Smart Snacks general standards)
- Welch's fruit snacks – sugar exceeds 35% sugar by weight
- Veggie Straws – potato starch is first ingredient, which is not considered a vegetable. This does not meet the Smart Snacks general standards

Acceptable documentation was not provided for the following products; therefore, compliance could not be determined:

- Vegetable crisps
- Nature Valley bars
- Baked Lays

In addition to the vending machines, there are also a la carte food options for sale at the Middle/High School. All a la carte food options that were not menued that day on the main line, or on the previous day's main line, must be compliant with the Smart Snacks standards.

Entrees may only be exempt from the Smart Snacks nutritional standards when they are offered the day the same item is sold on the main line, or the day after the entree item was menued on the main line. Additionally, accompaniments such as cream cheese or cheese sauce need to be included in the nutritional analysis. This means that if marinara or dipping sauce were to be sold with a breadstick or mozzarella stick, then the calories of the dipping sauce would need to be added to the nutritional information of the entree item it is paired with. When the nutritional information is calculated for the entree and the accompaniment then it must be entered into the [Smart Snacks product calculator](#) to determine compliance.

This process of determining compliance is also true for any recipe item sold a la carte (salads, sandwiches, wraps, veggies and dip etc.), that is not menued that day on the main line or was not menued the previous day. Begin to gather the product labels and all nutritional information for each product sold a la carte. Create recipes for all entree options.

Smart Snacks regulations allow entrees to be sold a la carte and be exempt from the nutritional standards, if and only if, they were served the same day or the day after the original entree was served on the main line.

Fundraisers

A school may also choose to hold fundraisers during the school day. If foods or beverages sold **do not meet** the Smart Snacks standards, these will be considered exempt fundraisers and the following rules must be followed:

- Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
- Exempt fundraisers cannot occur in the meal service area during meal times. Even though sales may occur outside of the meal service area during meal times, it is strongly discouraged. Many times these sales will affect breakfast and lunch participation in a negative way.
- Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Stratford School District does use a fundraiser tracking sheet, however it was noted that many fundraisers did not meet the state defined exempt fundraiser guideline of no more than two consecutive weeks in length. In addition, the time in which the fundraiser is being held is not explicitly stated on the tracking sheet. It would be helpful to begin documenting the time frame in which the fundraisers are offered. For example, in addition to writing “homeroom activity or ADV” include the times the foods and/or beverages are offered.

All this being said, we do not encourage this type of ongoing unhealthy food/beverage fundraiser within schools as it does not align with the intentions of Smart Snacks and the Healthy Hunger-Free Kids Act. Constant unhealthy food fundraisers undermine the progress you have made as a food service department to provide healthy, balanced meals to students.

Whenever possible, encourage student organizations to find ways to hold fundraisers that promote a healthy lifestyle. More information on healthy fundraisers can be found on our [Smart Snacks](#) webpage, found under the Fundraiser Resources heading. Many schools around the country have found that they can still be successful in raising funds using non-food or healthy food fundraisers. Perhaps this is something your district can gradually work towards.

Findings and Corrective Action Needed: Smart Snacks

Finding #7: Super Bakery mini powdered sugar donut and mini chocolate donut do not meet Smart Snacks standards for a snack. Each serving exceeds calories and sodium maximums.

Corrective Action Needed: State what will be done with these products to comply with the Smart Snack regulations.

Finding #8: Beverage vending machine contains beverages that are not compliant for Middle School students. The machine must be turned off for Middle School breakfast meal times, as well as for lunch meal times.

Corrective Action Needed: Submit a statement that confirms that the machine will be turned off for both breakfast and lunch meal service times when Middle School students are present.

Submit a photo of signage posted to the machine that states it is only for High School student use.

☐ **Finding #9:** The snacks listed below are not Smart Snacks compliant:

- Goldfish – not whole grain-rich and >200mg sodium
- Original Trail Mix – contains added fat (oil)
- Black Forest fruit snack – first ingredient is corn syrup, followed by sugar (does not meet the Smart Snacks general standards)
- Welch’s fruit snacks – sugar exceeds 35% sugar by weight
- Veggie Straws – potato starch is first ingredient, which is not considered a vegetable. This does not meet the Smart Snacks general standards

Corrective Action Needed: Submit a statement explaining how the school will bring all snacks sold in the vending machine into compliance. Include specifics on who at the school will be responsible for tracking items purchased and how documentation will be kept. If you choose to substitute a different product, submit the replacement product labels (clear, legible photos of package label, nutrition facts panel and ingredient lists) for review.

☐ **Finding #10:** A la carte items sold in the cafeteria (Elementary School and Middle/High School) not checked for Smart Snacks compliance. Many foods offered did not have recipes or nutrition information to accompany the product.

Corrective Action Needed: Submit a statement of understanding regarding the rules about Smart Snacks for a la carte sales. Detail your plan to bring the a la carte sales into compliance.

☐ **Finding #11:** Multiple exempt fundraisers did not abide by the two-week limit per the state-defined rules.

Corrective Action Needed: Submit a statement explaining how Stratford Middle and High School will bring all food and beverage exempt fundraisers into compliance, making sure to abide by the two-week limit. Include specifics on who at the school will be responsible for tracking exempt fundraisers.

4. BUY AMERICAN PROVISION

Commendations

Thank you to the food service director for maintaining documentation on non-compliant products.

Comments/Technical Assistance/Compliance Reminders

The USDA requires that School Food Authorities (SFAs) purchase, to the maximum extent practicable, domestic commodities or products. It is each school’s responsibility to ensure USDA dollars are spent on American grown products. Non-domestic items must have sufficient documentation, as outlined below.

A “domestic product” is defined as an agricultural commodity or product that is produced or processed in the United States (U.S.), including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands. “Substantial” means that over 51 percent of the final processed product

consists of agricultural commodities that were grown domestically.

If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted in an email. Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

The following information must be recorded on a Buy American Non-Compliant Product List. *Note:* In reference the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

When completing the [Buy American Non-Compliant Product list](#) there are 4 pieces of information that must be recorded:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
 - i. *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
 - b. **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
 - i. *Ex. Blueberries are not available domestically during the months of December – June.*
 - c. **Availability** – Product(s) is not available to purchase domestically.
 - i. *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
 - d. **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
 - i. *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
 - e. **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - i. *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
 - f. **Other**- Please provide a written explanation.
 - i. *Ex. The SFA received a donation of non-domestic oranges*
 - ii. *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Include the Buy American Provision in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory are compliant with the Buy American procedure. Sample written [Procurement Contract Management Procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) and Buy American monitoring procedures may be used and adjusted to meet the SFA's needs (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>).

5. RESOURCE MANAGEMENT

Non-profit School Food Service Account

Commendations:

- ✓ The Annual Financial Report (AFR) is an accurate reflection of Stratford School District's food service account.
- ✓ All charges to the account are allowable and there are no indirect costs charged.
- ✓ Adult meals are priced appropriately
- ✓ An unpaid meal charge policy is on file at the school

Technical Assistance:

- The entitlement value of USDA Foods (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP on the AFR. Any handling and processing fees must be recorded as a School *Purchased Services* Expenditure.
 - The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services webpage](https://dpi.wi.gov/nutrition/online-services) (dpi.wi.gov/nutrition/online-services).

Paid Lunch Equity (PLE)

The Paid Lunch Equity (PLE) tool was not required for Stratford School District during the 2018-19 school year, as it had a zero or positive fund balance in its food service account as of January 31, 2018. **For the 2019-20 school year, a similar exemption will take place with the completion of the [2019-20 PLE survey](#) by June 7, 2019** (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Revenue from Non-program Foods

Technical Assistance:

- The Non-Program Food Revenue Rule's requirement is that **the costs of non-program foods** (adult meals, extra milks, a la carte items, caterings, vending machines, etc.) **are covered by the non-program foods revenue**. The food service account is a protected account as it contains federal and state dollars for the service of meals that follow the meal pattern. As non-program foods are paid for out of this protected account, they could technically be paid for using reimbursement funds. To ensure program funds are not being used to support non-program foods, it is required to see the comparison of non-program and program costs and revenues. This comparison may be through the [DPI tool](#) or the [USDA tool](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls).

Findings and Corrective Action Needed: Revenue from Non-program Foods

Finding #12: The SFA has not demonstrated compliance with the [USDA Non-Program Foods Revenue Rule](#), as the DPI nor the USDA Non-Program Foods Revenue tool has been completed (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Corrective Action Needed: Please submit a completed DPI or USDA tool to demonstrate compliance with the Non-Program Food Revenue Rule.

6. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

- ✓ The SFA completed the Civil Rights Self-Compliance form (PI-1441)
- ✓ Civil Rights training was completed for all food service staff annually
- ✓ There was no overt identification of student meal benefits observed on site

Technical Assistance:

Civil Rights Complaint Procedures

- ✓ Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. You will want to make sure that this is included in the district procedures to ensure compliance.
 - o The SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

Finding #13: The non-discrimination statement is not listed on the Unpaid Meal Charge policy for the SFA.

Corrective Action Needed: Please update the policy and resubmit.

Finding #14: The required annual civil rights training is for all staff working within the school meals programs. Other than food service employees, all individuals listed as officials (DO, CO, VO, HO) within the online contract and anyone else who may work with the school meals programs are required to complete the annual civil rights training.

Corrective Action Needed: Please have these individuals complete the training and submit the updated attendance log.

Finding #15: There are no civil rights complaint procedures in place at the SFA that are specific to the school meals programs.

Corrective Action Needed: Please submit draft procedures that include language similar to the information under *Technical Assistance* above.

Local Wellness Policy

Commendations:

- ✓ Great highlight of local foods on lunch menus!

Findings and Corrective Action Needed: Local Wellness Policy

Finding #16: The Local Wellness Policy (LWP) for Stratford School District is missing information on the triennial assessment.

Corrective Action Needed: Please include this language and resubmit the LWP.

Resources:

- ✓ [LWP Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf)

Professional Standards

Technical Assistance:

- Annual Professional Standards training requirements are in place to uphold the nutritional and fiscal integrity of the school meals programs. The annual training hours are required:
 - Food service director: 12 hours
 - Food service manager: 10 hours
 - Full-time staff: 6 hours
 - Part-time staff: 4 hours
- The following are required to have their annual Professional Standards trainings **tracked**:
 - School nutrition directors, managers and staff, plus persons acting in these roles for more than 30 days per year.
 - School nutrition substitutes and volunteers, cashiers determining reimbursable meals at Point of Service (POS), office staff with school nutrition program duties (submitting claims for NSLP, SBP, ASP, SMP, WSDMP and/or FFVP, processing free and reduced price applications, verification, or financial management).

Findings and Corrective Action Needed: Professional Standards

Finding #17: There were no trackers to review for any employees working with the school meals programs.

Corrective Action Needed: Please submit completed trackers listing all trainings completed for each employee and who will be monitoring the completion of these

trackers each year (e.g. food service director, each employee will oversee his or her own tracker, etc.)

Resources:

- [DPI Professional Standards tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx)
- [Professional Standards training requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf)

Food Safety and Storage

Commendations:

- ✓ A site-specific Food Safety Plan is available on site
- ✓ Temperature logs are tracked and maintained on file
- ✓ No storage violations were observed

Findings and Corrective Action Needed: Food Safety and Storage

Finding #18: There is currently no Standard Operating Procedure (SOP) for field trip meals within the food safety plan. This is important to ensure food safety is properly handled when food is taken off site for field trips.

Corrective Action Needed: Please submit a draft template specific to Stratford High School's operations of field trip meals

Resources:

- [Field Trip Meals SOP template](https://dpi.wi.gov/school-nutrition/food-safety#templates) (https://dpi.wi.gov/school-nutrition/food-safety#templates)

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach

Technical Assistance:

- SFSP outreach is to be completed prior to the end of the academic school year to inform families of where meals are offered during the summer months.
- SBP outreach is to be completed at the beginning of the school year to inform families that the SFA offers breakfast each day school is in session. This may be done in the form of a letter or newsletter, or added to an existing letter sent out at the beginning of the year.

Compliance Reminders:

- A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, **USDA requires all SFAs to inform families of where their students can receive a free meal in the**

summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food webpage](http://www.fns.usda.gov/summerfoodrocks) (http://www.fns.usda.gov/summerfoodrocks)

Findings and Corrective Action Needed: SBP and SFSP

Finding #19: SFSP outreach was not completed.

Corrective Action Needed: Submit a completed draft of the outreach poster listed under *Resources*.

Finding #20: SBP outreach was not completed.

Corrective Action Needed: Submit a completed draft notification for SBP outreach.

Resources:

- [SFSP outreach poster](https://dpi.wi.gov/community-nutrition/sfsp/outreach) (https://dpi.wi.gov/community-nutrition/sfsp/outreach)
- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](http://dpi.wi.gov/statesupt/every-child-graduate) webpage (http://dpi.wi.gov/statesupt/every-child-graduate).”



With School Nutrition Programs!