

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

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**School Food Authority:** Wausau School District

**Agency Code:** 37-6223

**School(s) Reviewed:** Franklin Elementary, Lincoln Elementary, Wausau East High School

**Review Date(s):** November 12-16, 2018

**Date of Exit Conference:** 11/16/18

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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. 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](http://dpi.wi.gov/school-nutrition/training) webpage ([dpi.wi.gov/school-nutrition/training](http://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 [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Wausau School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. Everyone was 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.

Thank you for staying late to make sure everything was taken care of for the review. We are extremely appreciative of staff's organizational skills and attention to detail. The School Nutrition Programs are operating smoothly because of the Director's leadership and work ethic.

The DPI review team appreciates the eagerness of the Food Service Director, Administrative staff, and Food Service employees for their willingness to make changes to meet school nutrition program regulations.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The total number of eligibility determinations reviewed was 560. Of those determinations, only 5 errors were identified.

##### Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.

##### Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

##### Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

##### Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at [karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov) for more information and approval.

### Public Release

- Public release was well done by Wausau. It was sent to 12 different sites to be posted within the community. It was also paid for to be published in the local newspaper. Great job advertising the School Nutrition Programs!

### Direct Certification

- The effective eligibility date for a DC eligible student is the date of the original output file.

### Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to contact the prior attended LEA immediately for source documentation and re-determine the student's eligibility made at the student's previous LEA (if they participated in NSLP). When a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

### Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).
- The household can "self-disclose" by bringing in a copy of their free/reduced approval notice or direct certification approval letter to the designated official operating the outside program. This option removes food service from these types of requests and is preferred. DPI recommends limiting the number of staff members responsible for collecting this data (e.g., one school secretary who has been trained on confidentiality, rather than each athletic coach).

### **Findings and Corrective Action Needed: Certification and Benefit Issuance**

- ❑ **Finding #1:** Two students were shown on the Benefit Issuance list as receiving free meal benefits from Direct Certification. Both students were certified for reduced-price meal benefits through Direct Certification (Z coded), not Free benefits. The benefit listed within the software system was incorrect.

**Corrective Action Needed:** Notify the households, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

- ❑ **Finding #2:** One student was receiving free meal benefits due to an error when determining the application. The application should have been denied due to too high of income reported.

**Corrective Action Needed:** Notify the household, whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

- ❑ **Finding #3:** One student was receiving reduced-price meal benefits due to an error when determining the application. The application should have been denied due to too high of income reported.

**Corrective Action Needed:** Notify the household, whose benefits will be decreased from reduced to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

- ❑ **Finding #4:** One student was receiving free meal benefits due to an error when determining the application. The application should have been determined as reduced.

**Corrective Action Needed:** Notify the household, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

- ❑ **Finding #5:** For multiple applications, the start date of eligibility recorded on the Benefit Issuance was later than the date the Determining Official had determined the eligibility (as documented on the applications). Work with your software company to decipher why the eligibility start date was incorrect for those applications.

**Corrective Action Needed:** Submit a statement in writing (email) explaining how this will be corrected going forward so the eligibility start dates are correct.

### Verification

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The SFA chose to use the Alternate Two method for Verification. Of the 139 applications, 2 error prone income applications were verified and one categorical eligible application was verified. All applications were verified correctly.

- To complete Verification, households must submit 1 month's worth of income information or enough pay stubs to reflect what was reported on their application. The pay stubs must either be from one month prior, the current month, or one month after the application was submitted.

### **Meal Counting and Claiming**

#### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

- No errors were found on the monthly claims for reimbursement on the NSLP or SBP claims.
- When entering the monthly claim, use the highest total enrollment on any given day of the month for each site. Record the highest number of free and reduced eligible students on any given day of the month for each site as well.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- You may claim visiting student meals, for students visiting a CEP school, within the total reimbursable meals of that site. Make a note of this within your edit check.

#### **Findings and Corrective Action Needed: Meal Counting and Claiming**

- ❑ **Finding #1:** At Lincoln Elementary, students put their identification cards into a box to signify they took a breakfast. Some students put their card into the box but did not take a breakfast.

**Corrective Action Needed:** Submit a statement in writing (email) explaining how this will be corrected going forward so only the students taking a breakfast are being counted.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

#### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

Thank you to the staff of Wausau School District for their warm welcome, cooperation, and time during the Administrative Review. A special thanks to the Food Service Director and the Nutrition Services Operations Supervisor for putting together documentation both offsite and onsite and answering questions. We enjoyed our time at Wausau School District. Thank you for your hard work and dedication to your School Nutrition Programs!

The school nutrition professionals of Franklin Elementary are friendly, knowledgeable, and honest individuals. They work cooperatively and efficiently in a small, organized, and tidy kitchen. They asked questions and expressed concerns reflective of their understanding of USDA Child Nutrition Program requirements and regulations and of their deep caring for the students of Wausau School District. Franklin Elementary uses non-food rewards to celebrate good behavior, which is a great practice. Students earned seats at a decorated table and received a package of stickers. Other incentives displayed outside the office are also earned through good behavior.

The school nutrition professionals of Lincoln Elementary have great rapport with students. The kitchen is neat, clean, and organized and the school nutrition professionals work very well together to efficiently prepare school meals. There is eye-catching, colorful breakfast signage,

showing the breakfast menu for the week, posted in the meal service area. This is an excellent tool for promoting the School Breakfast Program.

East High School is an impressive food service operation with many hard working school nutrition professionals. Everyone works efficiently and effectively together to prepare and serve meals to students. There is a great variety of menu options on each service line and standardized recipes are used and followed for each of these menu items. The school nutrition professionals are friendly and work well with the students.

Wausau Alternative High School's school nutrition professional is warm and welcoming to students. She encourages students to select a reimbursable meal bag and also select milk, if they would like.

The school nutrition professional at PEER works well with the students. She effectively communicates with the point of contact at the high school that meals are received from to ensure adequate inventory of choices for both breakfast and lunch.

## **Technical Assistance**

### *Standardized Recipes*

Standardized recipes are required for all menu items that have more than one ingredient (e.g. cheeseburger on a bun, Bosco sticks with herbs). All standardized recipes must include **detailed** information about the specific ingredients, equipment, and procedures used to prepare the recipes. Standardized recipes produce consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school nutrition recipes. Recipes should be standardized in **each** production kitchen to reflect the products and practices used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Multiple product substitutions and significant standardized recipe changes made it extremely difficult to evaluate the menus at East High School for compliance with USDA lunch meal pattern requirements.

### *Milk Types*

At Wausau Alternative High School, there were two milk types available the entire service. However, there was only one option of one of the types available from mid service until the end. While this is excellent menu planning, please consider having additional stock of this type of milk available just in case student preferences change. It is required that two milk types always be available for students to select from.

### *Condiment Control*

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Condiment usage is not monitored nor are portion sizes communicated to students at the observed sites. Please monitor condiment usage and communicate appropriate portion sizes to students. Examples of ways to control condiment usage include: posting signage on bins for pre-packaged condiments indicating the planned portion, promoting appropriate serving sizes for pumps by adding signage at the condiment station with a

photo of what one tablespoon of the condiment looks like, purchasing single-use, one ounce cups to aid in portion control, or using signage such as “One pump, please!” on self-serve pumps.

#### *Extras*

Extra, non-creditable items, such as ice cream, pudding, and potato chips, are frequently offered on the menu. These foods do not credit toward the meal pattern but must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra, non-creditable items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extras are frequently served. These foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal.

#### *Vegetable Subgroups*

During the week of review, marinara sauce was offered to students at Franklin Elementary on Friday, October 19. Though any student could select marinara sauce, including those who selected a Turkey Ham & Cheese or a peanut butter and jelly sandwich, the marinara sauce was intended with the cheesy bites. This limited the amount of red/orange vegetable offered to students over the week of review to ½ cup; the weekly minimum requirement is ¾ cup.

#### *Reimbursable Meal Signage*

Adequate signage helps ensure that students accurately select reimbursable meals. Reimbursable meal signage was available near the end of the serving line at Lincoln Elementary. Consider repositioning this closer to the beginning of the serving line where students collect their trays, utensils, milk, and fruit. All available components and menu items were listed (i.e. the day’s menu).

It was noted that a few schools in Wausau School District are improperly categorizing menu items as the appropriate component. In contrast to My Plate, which identifies protein and dairy as food groups, the Healthy, Hunger-Free Kids Act meal pattern identifies meat/meat alternate and milk as components. These terms are not interchangeable. Dairy products, such as yogurt, hard boiled eggs, string cheese, and cubed cheese, are not creditable towards the milk component in the School Breakfast Program or National School Lunch Program.

#### *Signage for Fruits and Vegetables*

If proper portioning utensils cannot be used to serve certain fruits and vegetables, such as baby carrots at Franklin Elementary or the cold vegetables on the Deli Line at East High School, signage can be utilized to let students know how many pieces, or baby carrots in this example, they can select to have the full planned portion size. Examples of this type of signage and printable signage can be found on DPI SNT’s [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage under the Salad Bar Signage heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

It was observed at Lincoln Elementary that two ½ cup fruit choices are offered to students, but students are only able to select one of the two choices. To avoid removing fruits from students’ trays at the end of the meal service line, indicate on signage that one fruit choice (½ cup) is included with students’ meals.

### **Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality**

❑ **Finding #1:** Production records did not have the following information filled in or were missing the following categories based on the [Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) (“Must Haves and Nice to Haves”) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>):

- Franklin Elementary, Lunch
  - Planned number of each milk type must be recorded in addition to the total amount used
  - While the special dietary needs meals are recorded, all production record categories must be filled in for the special dietary needs meal. If only one part of the meal is substituted, such as a gluten free bun, and the rest of the meal is prepared with the other portions, then only the food item that is substituted can be recorded instead of the whole meal.
- Lincoln Elementary, Breakfast
  - Planned number of meals
  - Planned and actual number of the quantity prepared in purchase units (2-No 10 cans, 10 lb. case, 2-96 count case)
- Lincoln Elementary, Lunch
  - Planned number of servings for condiments and all alternate entrée options (PB&J, Turkey Ham & Cheese, cheese stick, graham cracker)
  - Portion size and planned number of portions for additional fruits and vegetables prepared onsite
- East High School, Lunch and Breakfast
  - Planned number of meals
  - Planned and actual number of purchase units prepared
  - Special dietary needs. A milk substitution is available for students, but it is not recorded on production records.
  - Condiments
- Wausau Alternative High School, Lunch
  - Number of leftover milk by each type
- PEER, Lunch
  - Leftovers recorded for each menu item, instead of a general leftovers statement at the top of the production record

In addition to the specific information regarding each site listed above, please note, planned portion sizes are required for every meal component. It is important to be specific on production records about the identity, brand, and description of the items served. It is especially important to ensure standardized recipes listed on production records are updated to reflect current recipes used during production.

**Corrective Action Needed:** Submit a written statement indicating understanding that the Production Record Requirements must be fulfilled and detailing Wausau School District’s action plan for ensuring production records at these sites will have all of the Production Record Must Haves listed and filled in.

❑ **Finding #2:** Production records were not available for breakfast for PEER for the week of review. It was reported that production records have not been kept for PEER breakfast all school year. Production records are required as documentation that the school is serving reimbursable meals that contain all required meal pattern components.



PEER serves less than 10 students daily. Although breakfast service was not able to be observed at PEER, it was observed by and explained to the Public Health Nutritionist that juice, milk, and other grain choices listed in **Finding #10** are sent in bulk from West High School to PEER that are then pulled from daily for breakfast service. These components were observed in the refrigerator and storage cabinet by the Public Health Nutritionist and signage was posted, indicating that breakfast has been offered at this site.

**Corrective Action Needed:** Submit documentation such as transport sheets, invoices, menus, etc. for September-November 2018 that provide more information on what was offered at breakfast during these months and demonstrate that all components were offered. In addition, submit two weeks of completed production records for the first two weeks breakfast production records are maintained for PEER breakfast.

☐ **Finding #3:** Valid crediting documentation was not available prior to the on-site review for the Turkey Ham & Cheese on a Whole Grain Hawaiian Bun - Individually Wrapped and the Honey Grahams with Fiber.

The Product Formulation Statement (PFS) for Turkey Ham & Cheese on a Whole Grain Hawaiian Bun - Individually Wrapped does not report accurate crediting of the turkey ham. In order for a PFS to accurately reflect crediting of an ingredient, the USDA Food Buying Guide yield information for that ingredient must be used. The PFS indicates that 0.80 ounces (oz) of turkey ham credits as 0.80 ounce equivalent (oz eq) meat/meat alternate (M/MA). The USDA Food Buying Guide reports that a 1.40 oz serving of turkey ham credits as 1.00 oz eq M/MA. Therefore, the Turkey Ham & Cheese would credit as 0.57 oz eq M/MA of turkey ham and 0.40 oz eq M/MA of cheese for a total of 0.97 oz eq, rounding down to 0.75 oz eq M/MA based on USDA crediting rounding rules.

The Turkey Ham & Cheese is served as an alternate entrée option at Franklin Elementary, Lincoln Elementary, and other non-reviewed sites. The crediting of the sandwich changes the menu planner's daily and weekly M/MA crediting and how a student selects a reimbursable meal under Offer versus Serve (OVS). The Turkey Ham & Cheese does not contain two full components, 1.00 oz eq M/MA and 2.00 oz eq grain, as the menu planner intended. Instead, the Turkey Ham & Cheese contains only one full component of grain.

The PFS for the Honey Grahams with Fiber is not considered a valid PFS because it does not contain the weights of the creditable ingredients. Without this information, it cannot be determined whether or not the PFS is accurate. Instead, the Honey Grahams with Fiber were credited using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf), crediting as 0.75 oz eq grain per 23 gram package for the week of review (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>).

The Honey Grahams with Fiber are served with alternate entrée options at Franklin Elementary, Lincoln Elementary, and other non-reviewed sites. The crediting of the graham crackers changes the menu planner's daily and weekly grain crediting and how a student selects a reimbursable meal under OVS. The Honey Grahams with Fiber are not one full component, 1.00 oz eq grain, as the menu planner intended. Instead, they credit as 0.75 oz eq, counting as an extra under OVS, but still contributing to daily and weekly grain requirements and subject to the weekly grain-based dessert limit.

A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct.

**Corrective Action Needed:** Please see **Finding #5** for corrective action for the Turkey Ham & Cheese. Please see **Finding #9** for corrective action for the Honey Grahams with Fiber.

☐ **Finding #4:** At Lincoln Elementary, there is a traditional breakfast model where students come through the service line prior to the beginning of the school day. Lincoln Elementary allows students that are unable to attend the breakfast service prior to the beginning of the school day access to a meal. A breakfast cart is left out in the meal service area with the grain option and fruit. However, milk is not able to be offered or selected because the milk cooler is locked. Therefore, these students are not being offered all components of the reimbursable meal and the milk component is considered missing.

Breakfast meals are also sent to the front office, so students who miss the breakfast cart can have access to a meal. However, only the grain option and ½ cup of fruit are available in the office. Therefore, there is a daily and weekly fruit shortage at breakfast for the meals offered in the office and a missing milk component.

The meals served during the day of on-site breakfast observation were corrected.

**Corrective Action Needed:** Submit a written statement detailing Lincoln Elementary's action plan for ensuring the milk component is offered on the breakfast cart and the milk component and full 1 cup of fruit are offered in the office.

***Additionally, fiscal action is required for any missing component violations. Therefore, fiscal action will be assessed. Per pages 79-80 of the Administrative Review Manual, fiscal action must be assessed when a meal component is missing. During the week of review, there were 16 meals that were claimed for reimbursement on the breakfast cart or office. Fiscal action will be assessed on these 16 meals. Please note, missing component violations will result in fiscal action and a daily and/or weekly fruit shortage may result in fiscal action during subsequent Administrative Reviews.***

☐ **Finding #5:** Documentation provided for the week of review demonstrated a weekly meat/meat alternate (M/MA) shortage at lunch for Franklin Elementary and Lincoln Elementary. The following entrees contained the minimum amount of grain offered on each day during the week of review:

- Monday: Turkey Ham & Cheese with cheese stick and graham cracker (1.75 oz eq M/MA)
- Tuesday: Turkey Ham & Cheese with cheese stick and lemon blueberry bites (1.75 oz eq M/MA)
- Wednesday: Popcorn chicken (10 pieces) and breadstick (1.50 oz eq M/MA)
- Thursday: Turkey Ham & Cheese with cheese stick (1.75 oz eq M/MA)
- Friday: Turkey Ham & Cheese with cheese stick and graham cracker (1.75 oz eq M/MA)

The total creditable amount of M/MA offered over the course of the week of review was 8.50 oz eq M/MA. The K-8 lunch minimum weekly M/MA requirement is 9.00 oz eq. Please see **Finding #3** for more information about the Turkey Ham & Cheese crediting.

**Corrective Action Needed:** Submit a written statement explaining how the weekly 9.00 oz eq M/MA requirement at lunch for the week of review will be met and your plan for ensuring the minimum M/MA requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

***Please note, repeat violations of a weekly meat/meat alternate shortage during subsequent Administrative Reviews may result in fiscal action.***

❑ **Finding #6:** Documentation provided for the week of review demonstrated a daily M/MA shortage at lunch for East High School on the Express Line. Based on the submitted standardized recipe and crediting documentation,  $\frac{1}{3}$  cup of Philly steak sandwich credits as 1.50 oz eq M/MA. The 9-12 minimum daily M/MA requirement is 2.00 oz eq.

**Corrective Action Needed:** Submit the weight of  $\frac{1}{3}$  cup of Philly steak. If  $\frac{1}{3}$  cup of the steak does not credit as 2.00 oz eq M/MA, the daily requirement at lunch, please update and submit the standardized recipe for the Philly steak sandwich.

***Please note, repeat violations of a daily meat/meat alternate shortage during subsequent Administrative Reviews may result in fiscal action.***

❑ **Finding #7:** Documentation provided for the week of review demonstrated daily M/MA shortages Monday-Friday, also leading to a weekly M/MA shortage, at lunch for East High School on the Deli Line. The minimum amount of M/MA offered daily Monday-Friday was 1.50 oz eq M/MA. The daily 9-12 M/MA requirement is 2.00 oz eq. Over the course of the week, the minimum amount of M/MA offered was 7.50 oz eq. The weekly 9-12 M/MA requirement is 10.00 oz eq.

Based on the standardized recipes used during the week of review and crediting documentation, eleven of the deli options did not meet the daily 2.00 oz eq M/MA requirement for the 9-12 meal pattern. The following options credited as less than 2.00 oz eq M/MA: Sub Turkey on WW Roll (1738), Turkey & Cheese Sub (1579), Turkey & Ham Sub (957), Turkey Sandwich on WW (941), Turkey & Cheese Sandwich (1742), Turkey and Ham on WW Bread (1732), Sub Ham on Wht Rchs Bun (1650), Chicken Salad (1982) Sandwich, Egg Salad (1981) Sandwich, Chicken Salad Wraps (1991), Egg Salad Wraps (1990), and Vegetarian Salad (1704).

Prior to submitting documentation for the Administrative Review, there was a change in the luncheon meats, cheeses, wraps, and breads offered on the Deli Line. With this came an overhaul of standardized recipes. Updated standardized recipes were submitted as documentation for the Administrative Review. However, these recipes did not reflect what was actually offered during the week of review in October. The recipes that were used in October during the week of review were outdated and did not contain the products that were used during the week of review. After conversations with the Nutrition Services Operations Supervisor, the school nutrition professional who prepares the Deli Line, and the East High School Kitchen Manager, the correct products and portion sizes were able to be identified and the recipes credited.

During the on-site review, the Public Health Nutritionist discussed the Deli Line with the Food Service Director. The Food Service Director noted that there are many options on the Deli Line

and expressed interest in changing the setup and number of menu options on the line. Technical assistance was provided on different ways to set up and reduce the number of options on the Deli Line. The Food Service Director expressed that there would be changes to the Deli Line in the months following the review.

**Corrective Action Needed:** Please see **Finding #8** for corrective action needed for the daily and weekly M/MA shortage at lunch at on the East High School Deli Line.

**Please note, repeat violations of a daily and/or weekly meat/meat alternate shortage during subsequent Administrative Reviews may result in fiscal action.**

❑ **Finding #8:** Documentation provided for the week of review demonstrated daily grain shortages Monday-Friday, also leading to a weekly grain shortage, at lunch for East High School on the Deli Line. The minimum amount of grain offered daily Monday-Friday was 1.25 oz eq. The 9-12 daily grain requirement is 2.00 oz eq. Over the course of the week, the minimum amount of grain offered was 6.25 oz eq. The weekly 9-12 grain requirement is 10.00 oz eq.

Based on the standardized recipes used during the week of review and crediting documentation, the Chef Salad (1598) with Sun Chips did not meet the daily 2.00 oz eq grain requirement for the 9-12 meal pattern. The Chef Salad (1598) with Sun Chips credits as 1.25 oz eq grain.

**Corrective Action Needed:** Submit a [9-12 lunch Menu Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc) for the updated Deli Line, if applicable, indicating that all daily and weekly M/MA and grain requirements are met for this line with the updated offerings (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc>). Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

If there have not been changes to the Deli Line, submit a 9-12 lunch Menu Planning Worksheet, indicating how the daily and weekly M/MA and grain requirements for the week of review will be met and your plan for ensuring the daily and weekly requirements are met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

**Additionally, fiscal action is required for any repeat daily grain shortage violations from the previous Administrative Review. Therefore, fiscal action will be assessed. Per page 81 of the Administrative Review Manual, there will be a reclaim of meals with the insufficient grain quantity. All 23 Chef Salad meals, the total offered Monday-Friday the week of review, will be reclaimed due to an insufficient grain quantity offered. The following repeat violation was documented from the School Year (SY) 2014-15 Administrative Review:**

- ***“During the week of review (February 16-20, 2015), it was noted that one lunch entrée served at West High School credited as 1.5 ounce equivalent of grain; creating a 0.5 ounce grain shortage for that day. Sufficient ounce equivalents of grains were planned to meet the weekly requirements for students in grades 9-12. A review of other weeks in February 2015 reporting period revealed that no other daily shortages occurred.”***

**Please note, repeat violations of a daily and/or weekly grain shortage during subsequent Administrative Reviews may result in fiscal action.**

❑ **Finding #9:** Documentation provided for the week of review demonstrated a weekly grain shortage at lunch for Franklin Elementary. The following entrees contained the minimum amount of grain offered on each day during the week of review:

- Monday: PB&J with cheese stick and graham cracker (1.75 oz eq grain)
- Tuesday: PB&J w/ cheese stick and blueberry lemon bites (2.00 oz eq) AND Mandarin orange chicken, brown rice, blueberry lemon bite cookies (2.00 oz eq grain)
- Wednesday: PB&J with cheese stick (1.00 oz eq grain)
- Thursday: PB&J with cheese stick (1.00 oz eq grain) AND turkey and gravy with dinner roll (1.00 oz eq grain)
- Friday: PB&J with cheese stick and graham cracker (1.75 oz eq grain)

The total creditable amount of grain offered over the course of the week of review was 7.50 oz eq. The K-8 lunch minimum weekly grain requirement is 8.00 oz eq. Please see **Finding #3** for more information about the graham cracker crediting.

**Corrective Action Needed:** Submit a written statement explaining how the weekly 8.00 oz eq grain requirement at lunch for the week of review will be met and your plan for ensuring the minimum grain requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

***Please note, repeat violations of a weekly grain shortage during subsequent Administrative Reviews may result in fiscal action.***

❑ **Finding #10:** Documentation was not provided for PEER breakfast for the week of review due to a lack of production records. During on-site lunch observation at PEER, the breakfast menu/signage indicated that students are offered a choice of one of the following daily: Benefit Bar (2.00 oz eq grain), muffin (1.00 oz eq grain), or banana bread (2.00 oz eq grain). The 1.00 oz eq muffin results in a weekly grain shortage at breakfast because the muffin offers 5.00 oz eq grain over the course of the week. The K-12 breakfast minimum weekly grain requirement is 9.00 oz eq grain.

**Corrective Action Needed:** Submit a written statement explaining how the weekly 9.00 oz eq grain requirement at breakfast for the week of review will be met and your plan for ensuring the minimum grain requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

***Please note, repeat violations of a weekly grain shortage during subsequent Administrative Reviews may result in fiscal action.***

❑ **Finding #11:** Documentation provided for the week of review indicated that 94 percent of grains offered for breakfast at East High School were whole grain-rich (WGR). It is required that 100 percent of grains offered at breakfast and lunch be WGR. Grains that are not WGR cannot be credited toward daily or weekly WGR requirements.

The English muffin for the ham and egg sandwich offered on Monday and the Canadian bacon and egg sandwich offered on Tuesday is not WGR. Foods that meet the WGR criteria for the Child Nutrition Programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched.

**Corrective Action Needed:** Submit a written statement indicating how the WGR requirement at breakfast for the week of review will be met and your plan for ensuring the requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable, for the product that will be used instead of the English muffin that was used during the week of review.

☐ **Finding #12:** Documentation provided for the week of review indicated that 69.9 percent of grains offered for lunch at East High School on the Deli Line were WGR.

The tortillas served with the Turkey Wrap w/ shredded cheese (1993), Turkey & Ham Wrap w/ shredded cheese (1995), Turkey Ham Wrap w/ shredded cheese (1994), Chicken Salad Wraps (1991), Tuna Salad Wraps (1989), and Egg Salad Wraps (1990) offered daily during the week of review are not WGR.

**Corrective Action Needed:** Submit a written statement indicating how the WGR requirement at lunch for the week of review will be met and your plan for ensuring the requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable, for the product that will be used instead of the tortillas that were used during the week of review.

***Please note, failure to meet the 100% whole grain-rich requirement during subsequent Administrative Reviews may result in fiscal action.***

☐ **Finding #13:** Documentation provided for the week of review demonstrated the weekly grain-based dessert limit was exceeded at Franklin Elementary and Lincoln Elementary. No more than 2.00 oz eq of grain-based desserts can be offered per week at lunch.

At Franklin Elementary, the grain-based dessert limit was exceeded due to the Honey Grahams with Fiber offered on Monday and Friday (0.75 oz eq grain, totaling 1.50 oz eq grain) and Lemon Blueberry Bites offered on Tuesday (1.00 oz eq grain) for a total of 2.50 oz eq of grain-based desserts.

At Lincoln Elementary, the grain-based dessert limit was exceeded due to the Honey Grahams with Fiber offered on Monday, Wednesday, and Friday (0.75 oz eq grain, totaling 2.25 oz eq grain) and Lemon Blueberry Bites offered on Tuesday (1.00 oz eq grain) for a total of 3.25 oz eq of grain-based desserts. Additional Honey Grahams with Fiber were added to the production record on Tuesday and Wednesday at the school. Technical assistance was provided to the school nutrition professionals while onsite regarding grain-based desserts and the weekly limit.

Please note, if the PFS for Honey Grahams with Fiber was valid (please see **Finding #3**), the total oz eq of grain-based desserts offered at both schools would be greater.

Grain-based desserts must be WGR to count towards the grain component. If a grain-based dessert is not WGR, it cannot count towards the grain component. However, grain-based desserts contribute towards the weekly grain-based dessert limit regardless of whether they are WGR or not (e.g., a slice of cake made with enriched white flour cannot credit towards the grain component, but it counts towards the grain-based dessert limit for the week in which it is served).

**Corrective Action Needed:** Submit a written statement indicating how the grain-based dessert limit will not be exceeded for the week of review and your plan for future service weeks.

❑ **Finding #14:** Documentation was not provided for PEER breakfast for the week of review due to a lack of production records. During on-site observation at PEER, the breakfast menu/signage indicated that students were only offered ½ cup of fruit in the form of juice daily, resulting in both a daily and weekly fruit shortage at breakfast. The K-12 minimum daily fruit requirement is 1 cup and the minimum weekly fruit requirement is 5 cups.

Technical assistance was provided to the Food Service Director who indicated understanding. Corrective action was planned to take place the following morning, prior to breakfast meal service observation, however, the meal service was canceled due to school not being in session on this day.

**Corrective Action Needed:** Submit a written statement explaining how the daily 1 cup fruit requirement at breakfast for the week of review will be met and your plan for ensuring the minimum fruit requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

***Please note, repeat violations of a daily and/or weekly fruit shortage during subsequent Administrative Reviews may result in fiscal action.***

❑ **Finding #15:** Documentation provided for the week of review demonstrated that the 50 percent juice limit was exceeded at breakfast at East High School and breakfast at PEER. An offering of fruits or vegetables for the purposes of assessing the juice limit is defined as the amount a student is able to select at a given meal, regardless of the number of options/variety of fruits or vegetables. The total amount of juice available at all meals over the course of the week (separately for lunch and breakfast) is then divided by this total fruit or vegetable offering to determine the weekly juice offering. No more than half of the total fruit or vegetable offering may be in the form of juice.

At East High School, the juice limit was exceeded on Tuesday and Thursday at breakfast when smoothies were offered. The smoothies each contained ¼ cup of fruit juice and ¼ cup of pureed fruit, which credits as fruit juice, totaling ½ cup fruit juice. On Tuesday and Thursday, students were also offered ½ cup fruit juice. Students were able to select the smoothie (½ cup fruit juice) and ½ cup fruit juice on these days. However, students were limited to selecting only two types of fruit. Therefore, a student could have selected 1 cup of fruit juice on Tuesday and Thursday, resulting in the 50 percent juice limit being exceeded.

At PEER, the only fruit offered at breakfast daily is fruit juice. Therefore the fruit offering exceeds the 50 percent juice limit because 100 percent of fruit offerings is in the form of fruit juice.

**Corrective Action Needed:** Submit a written statement detailing how the weekly juice limit at breakfast will not be exceeded for the week of review and your plan for future service weeks at both East High School and PEER.

❑ **Finding #16:** Documentation provided for the week of review demonstrated a missing starchy vegetable subgroup at Wausau Alternative High School and PEER. It appears this is due to

confusion about Dragon Punch and Cherry Star juice crediting. The first ingredient of both of these juices is juice from sweet potatoes. Sweet potatoes credit as a red/orange vegetable, not a starchy vegetable. However, because this beverage contains both vegetable and fruit juice, this beverage credits as an additional vegetable, not red/orange. Therefore, the Dragon Punch and Cherry Star juice credit as a vegetable for the daily and weekly vegetable quantity requirements, but do not credit towards a subgroup.

No other starchy vegetables were offered during the week of review.

**Corrective Action Needed:** Submit a written statement explaining how the ½ cup starchy vegetable requirement for the week of review will be met and your plan for ensuring the starchy vegetable requirement is met for future service weeks at both Wausau Alternative High School, PEER, and other non-reviewed sites. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

☐ **Finding #17:** The Three Bean Salad recipe provided for the week of review for Wausau Alternative High School and PEER does not appear to yield 66-½ cups as the recipe indicates because there are 36 cups of beans that go into the recipe. It is also unclear what the volume of onion and green peppers is in this recipe because the sizes of these products can vary. The Three Bean Salad recipe is unable to be credited and the beans/peas (legumes) vegetable subgroup contribution is unable to be determined for the week of review at this time.

**Corrective Action Needed:** Submit the total volume the current Three Bean Salad recipe yields. Update and submit a new standardized recipe for the Three Bean Salad.

☐ **Finding #18:** During on-site observation at Lincoln Elementary, lunch signage was present. However, it did not have the required OVS statement that students must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination.

Wausau Alternative High School did not have lunch signage, showing students what makes up a reimbursable meal. Signage must also include the required OVS statement, mentioned above.

PEER had breakfast and lunch signage, however, the signage did not accurately reflect what makes up a reimbursable meal and did not contain the required OVS statement, mentioned above.

Lunch signage was present on the East High School Deli Line. However, it did not contain the required OVS statement, mentioned above.

**Corrective Action Needed:** Submit pictures of updated, posted lunch signage at Lincoln Elementary, Wausau Alternative High School, and East High School and posted breakfast and lunch signage at PEER that include the required OVS statement that students must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination.

☐ **Finding #19:** Prior to lunch service observation at East High School, heavy technical assistance was given and corrective action was completed on the Deli Line. The updated recipes for the Deli Line were provided onsite on the day of review. After crediting the Deli Line recipes, it was discovered that there were numerous sandwiches and salads that did not meet the daily 2.00 oz



eq meat/meat alternate and/or daily 2.00 oz eq grain requirement. The Food Service Director and school nutrition professionals were able to correct these shortages prior to meal service.

During lunch meal service observation, the daily 2.00 oz eq grain requirement was not met at East High School on the Express Line. There were two entrée options, hamburger with cheese and a bun (2.00 oz eq grain) or three chicken tenders (1.00 oz eq grain). On this day, a cookie (1.25 oz eq grain) was planned to be offered with both entrees, however, the cookie was never put on the line, leading to a daily grain shortage for all chicken tender entrees. The cookie was listed on production records on this day.

**Corrective Action Needed:** Submit a written statement explaining your plan for ensuring the minimum 2.00 oz eq grain requirement is met for future service weeks for the chicken tenders menu option on the Express Line. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

***Fiscal action will be assessed on the 84 spicy chicken tender meals but will not be duplicated with the 3 non-reimbursable meals on the Express Line in Finding #20. Please note, repeat violations of a daily grain shortage during subsequent Administrative Reviews may result in fiscal action.***

☐ **Finding #20:** During lunch meal service observations, there were a total five non-reimbursable meals. One non-reimbursable meal was observed at Franklin Elementary due to one student selecting less than ½ cup fruit, vegetable, or combination. The student only selected one carrot. Another non-reimbursable meal was observed at East High School on the Lumberjack Line due to one student not selecting three full components. The student selected the grain component (pasta, without chicken Alfredo sauce, and cookie) and 1 cup of fruit (applesauce and juice). Three non-reimbursable meals were observed at East High School on the Express Line due to chicken tenders (2.00 oz eq M/MA and 1.00 oz eq grain) not containing two full components. The three meals were:

- Chicken tenders (2.00 oz eq M/MA and 1.00 oz eq grain), ½ cup fruit, and ½ cup vegetable
- Chicken tenders (2.00 oz eq M/MA and 1.00 oz eq grain) and apple (1 cup)
- Chicken tenders (2.00 oz eq M/MA and 1.00 oz eq grain), chicken tenders (should be charged a la carte because duplicate entrees are not allowable), and apple (1 cup)

**Corrective Action Needed:** Submit a written statement explaining how each of these errors will be corrected and avoided in the future.

***Fiscal action will be assessed on these 5 non-reimbursable meals but will not be duplicated with the 84 chicken tender meals on the Express Line in Finding #19.***

☐ **Finding #21:** The school nutrition professionals at East High School were somewhat unclear about the OVS requirements for lunch demonstrated by five non-reimbursable meals observed, conversations with point-of-service staff, and point-of-service staff not knowing how entrees credit to determine full components. Technical assistance was provided onsite but additional OVS training is required to ensure all meals claimed for reimbursement in the future are in fact reimbursable. Breakfast OVS training will also need to be completed based on **Finding #22**.

The [Offer Versus Serve Guidance Manual](#) and [Offer Versus Serve webcasts](#) (Offer versus Serve and Offer versus Serve - Meal or No Meal Lesson and Game) 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#ovs>).

**Corrective Action Needed:** Submit a brief explanation on how breakfast and lunch OVS training plans to be conducted for East High School point-of-service staff. Submit a signed training roster after the training has been completed.

❑ **Finding #22:** During on-site breakfast meal observation at East High School, all meals observed were reimbursable. However, students were unable to select all three components in their full required quantities, if they wanted, and were required to put components of the reimbursable meal back on the line or pay a la carte for these items. This is improper implementation of OVS.

The point-of-service explained that students are only able to select three food items under OVS. It was explained to the point-of-service and Food Service Director that under OVS students must select a minimum three food items, one of which is ½ cup fruit, vegetable, or combination and must be able to select all full components of the reimbursable meal.

Because East High School is limiting students to three food items, students do not have access to all breakfast components in their full daily requirements. For example, if a student were to select cereal (1.00 oz eq grain, 1 food item), ½ cup fruit (1 food item), and ½ cup juice (1 food item), this student would not be able to select 1 cup of milk as part of the reimbursable meal and either would have to put it back or pay for it a la carte. This example and many others were provided to the Food Service Director during the on-site review.

**Corrective Action Needed:** Submit a detailed statement explaining your plan for ensuring students are able to access all components in their full daily required quantities and how you plan to promote this change to students.

### 3. RESOURCE MANAGEMENT

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

##### Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
  - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
  - Under “Purchased Services” report any time you pay someone for services provided such as equipment repair and health inspections.

- Under “nonprogram foods”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
- When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

### Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

### Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf)
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter
  - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf).

### Revenue from Nonprogram Foods

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

### Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates should be used to determine adult prices.

### Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

### Indirect Costs

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school

district. Examples of supporting documentation for costs assessed to food service fund could include:

- Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
- Utility charges - separately metered or current usage study by the local utility company.
- Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

#### **4. GENERAL PROGRAM COMPLIANCE**

##### **Civil Rights**

##### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

- The And Justice For All poster was posted in a publicly visible location at all reviewed sites.
- The appropriate USDA Non-discrimination statement was used on all program materials.
- The Civil Rights Self-Compliance form was completed on October 24, prior to the October 31 deadline.

##### **Overt Identification**

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal eligibility status and prices for student meals were visible on the computer screens at Franklin Elementary School and East High School that can be seen by students and staff members; this constitutes as overt identification.

##### **Processes for complaints**

- 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 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A 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).

##### **Special Dietary Needs**

- If accommodating students with allergies by having a specific table to sit at, it is advised to not label it “peanut free” or “allergen free”. Instead, label it “allergen aware” or “peanut aware” as you may not be able to guarantee the table(s) are free from any allergens at all times of the day. The school(s) should have special procedures for special dietary needs.
- Franklin Elementary has forms on file signed by parents indicating which students must sit at the allergen aware table. However, the food service staff expressed concerns that these tables are not being closely monitored by the person(s) responsible and that students with the food allergies are not sitting there. It is recommended that the school develop procedures of who will monitor the allergen free table(s) to ensure students with food allergies are not being exposed to allergens.

### **Findings and Corrective Action Needed: Civil Rights**

- ❑ **Finding #1:** There is a code number for each meal benefit category (free, reduced, or paid) and the price for a breakfast or lunch shows on the computer screen indicating whether the student is free, reduced, or paid eligible.

**Corrective Action Needed:** Work with the software company to reconfigure the point of sale software to not show the eligibility status code or the price of a lunch or breakfast so no overt identification is occurring. **Submit a statement via email that this has been completed.**

- ❑ **Finding #2:** There was no And Justice for All poster posted at the PEER site or the Wausau Alternative High School.

**Corrective Action Needed:** Post the And Justice for All Poster at these sites. **Submit a statement via email that this has been completed.**

- ❑ **Finding #3:** The Sharing Information with Other Programs form does not have the full USDA non-discrimination statement on it.

**Corrective Action Needed:** Update the form to have the full USDA non-discrimination statement on it and submit a copy to the consultant.

- ❑ **Finding #4:** Staff at Franklin Elementary are consuming food served to students after the point of sale. The intention of the School Nutrition Programs is to feed students, not adults. Any adults that want food must purchase it.

**Corrective Action Needed:** Discontinue this practice. **Submit a statement to the Consultant of how this was communicated to staff and what the plan is moving forward to ensure adults are not eating any food from the Child Nutrition Programs for free.**

- ❑ **Finding #5:** Staff at Franklin Elementary are choosing what components students must take for a reimbursable meal. This is unallowable. Students have the right to choose what components they want to consume to create a reimbursable meal. This has been occurring during Breakfast in the Classroom. Teachers are discouraging students from taking a juice saying it is too messy or they are allowing students to take a juice but not letting them consume it in the classroom.

Per the DPI Civil Rights powerpoint:

“All students in the same grade grouping must be offered the same selection of menu items in the same amounts regardless of their eligibility, sex, national origin, race/color, etc., including when a school offers:

- A selection of more than one type of meal that is claimed for reimbursement
- A variety of foods and fluid milk for choice within the meal requirements”

**Corrective Action Needed:** Discontinue allowing teachers or other staff from discouraging students of the components they can take for reimbursable meals. **Submit a statement to the Consultant of how this was communicated to staff, what the plan is moving forward to ensure staff is educated on Offer vs. Serve, as well as Civil Rights, and how you will monitor this so it doesn't continue.**

### On-site Monitoring

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The on-site monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

### Local Wellness Policy

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

#### Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)

- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

#### Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies ([http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

#### **Findings and Corrective Action Needed: Local Wellness Policy**

- ❑ **Finding #1:** The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the following which are missing from the Local Wellness Policy...

- SFAs to identify in the policy, the official responsible for the LWP oversight.
- SFAs to include language in the policy, related to permitting the public to participate in development, implementation, and review of the policy.
- SFAs to include, at a minimum, one specific goal for nutrition promotion in the LWP and explore the use of evidenced based strategies when identifying goals, e.g. 'Smarter Lunchroom' tools and strategies.



- SFAs to include language in the policy specifying how the SFA will inform the public of content and implementation of the policy.

**Corrective Action Required:** Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy 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). **Provide a statement of when you plan to have the policy updated and compliant with the final rule.** The [Wellness Policy Builder](https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy (https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1).

- Finding #2:** Marketing of non-compliant Smart Snacks items was observed on two counter top coolers.

**Corrective Action Required:** SFAs may only market products that adhere to Smart Snacks guidelines during the school day. Provide a statement of how you will make the countertop coolers compliant.

### Smart Snacks in Schools

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

##### *Final Rule*

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, including the [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) handout (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf).

##### *Standardized Recipes*

A standardized recipe is required for any Smart Snacks that contain more than one ingredient when prepared. This standardized recipe should then be assessed for Smart Snacks compliance. The [Smart Snacks Recipe Analyzer Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/smart-snacks-recipe-analyzer.xlsx) can be used (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/smart-snacks-recipe-analyzer.xlsx).

##### *Beverages*

If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie ( $\leq 5$  kcal/fluid ounce [fl oz]) flat or carbonated, or no-calorie beverages ( $< 5$  kcal/8 fl oz;  $\leq 10$  kcal/20 fl oz.) flat or carbonated beverages are unallowable.

#### Findings and Corrective Action Needed for Smart Snacks in Schools:

❑ **Finding #1:** At Lincoln Elementary, popcorn and snow cones are occasionally sold to students on the school campus, during the school day. Popcorn does not have a standardized recipe, including yields (serving size for single portion(s), total number of portions, and total volume or measure [gallons or pounds]). Snow cones prepared with sugar-free syrup are non-compliant with Smart Snacks general standards, as they are not a whole grain-rich product; do not have a fruit, vegetable, dairy product, or protein food (meat, beans, poultry, etc.) as the first ingredient; and are not a combination food with at least ¼ cup fruit and/or vegetable. Furthermore, snow cones prepared with sugar-free syrup are not allowable as a beverage, as no-calorie beverages are non-compliant at the elementary school level.

The Wisconsin DPI allows up to two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

**Corrective Action Needed:** Submit a standardized recipe for the popcorn with respective labels for each ingredient. Submit a statement indicating understanding that the snow cones can no longer be sold to students on the school campus during the school day, unless the snow cones are being sold as part of an exempt fundraiser. Submit a statement detailing understanding of the fundraiser exemptions and indicate what position at Lincoln Elementary will be in charge of keeping track of fundraisers.

❑ **Finding #2:** At East High School, students prepare and sell coffee and accompaniments to students in the cafeteria before the school day. Accompaniments include sugar-free, flavored syrups, half and half, flavored creamers, and sweeteners. The students do not prepare individual beverage orders according to standardized recipes, using weights and/or measuring utensils.

Coffee and espresso drinks are allowable beverages at the high school level, grades 9-12. Ensure products are offered in acceptable portion sizes to comply with Smart Snacks standards. Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories from the coffee, cream, and sugar need to be added together when determining if the beverage meets the guidelines below:

- Calorie-free beverages (for black coffee only)
  - <5 calories per 8 fl oz; ≤10 calories per 20 fl oz
  - Maximum serving size: 20 fl oz
- Lower-calorie beverages (for coffee with cream and/or sugar)
  - ≤40 calories per 8 fl oz; ≤60 calories per 12 fl oz
  - Maximum serving size: 12 fl oz

**Corrective Action Needed:** Submit standardized recipes (e.g. 12 fl oz black coffee, one tub flavored creamer, and one packet of sugar) for the beverages offered on the coffee cart with

respective labels for each ingredient. Alternatively, submit documentation for one week of usage of each flavored creamer, sugar-free syrup, sugar packets, and coffee on the coffee cart.

❑ **Finding #3:** At East High School, the Jack Shack school store is operated by business education and DECA. Several items for sale in the school store are non-compliant with Smart Snacks general and nutrition standards. Goldfish crackers, Baked Cheetos, and Rice Krispies treats are not whole grain-rich. Baked Ruffles Sour Cream and Cheddar are too high in sodium. Nature's Bakery Stone Ground Whole Wheat Raspberry Fig Bars are too high in calories and sugar for both bars.

The business education teacher utilizes the [Alliance for a Healthier Generation Smart Snacks Calculator](https://foodplanner.healthiergeneration.org/calculator/) to evaluate product compliance (<https://foodplanner.healthiergeneration.org/calculator/>). Shopping online or at warehouse clubs limits options of Smart Snacks compliant products; however, the teacher expressed interest in partnering with and nutrition services and their distributor to order compliant products. Additionally, the [Alliance for a Healthier Generation Products webpage](https://foodplanner.healthiergeneration.org/products/) may aid in the search for compliant products based on the category of food or beverage that business education and DECA would like to sell (<https://foodplanner.healthiergeneration.org/products/>).

**Corrective Action Needed:** Submit a written statement detailing your plan and timeline for bringing these non-compliant products and others in the store into compliance with the Smart Snacks regulations.

❑ **Finding #4:** At East High School, there is a vending machine in the meal service area that students have access to during the school day that is overseen by Athletic and Activities Director. Several items for sale in the vending machines are non-compliant with Smart Snacks general and nutrition standards. All 12 fl oz Gatorade beverages are too high in calories. Nature's Bakery Stone Ground Whole Wheat Raspberry and Blueberry Fig Bars are too high in calories and sugar for both bars in each package.

**Corrective Action Needed:** Submit a written statement detailing your plan and timeline for bringing these non-compliant products and others in the vending machines into compliance with the Smart Snacks regulations.

❑ **Finding #5:** At Wausau Alternative High School, there are two vending machines in a locked room that students have access to at the beginning and end of the instructional day. There are non-compliant foods, such as candy bars and non-whole grain rich chips and crackers, and non-compliant beverages, such as regular soda and other beverages that do not meet the beverage standards for the youngest age/grade group.

**Corrective Action Needed:** Submit a written statement detailing your plan and timeline for bringing these non-compliant products and others in the vending machines into compliance with the Smart Snacks regulations.

### **Buy American**

### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy,

small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation. SFAs must monitor contractor performance, to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

## **Technical Assistance**

### *Non-Compliant Products Found*

The following products identified in Wausau School District's storage did not have proper labeling to identify the country of origin:

- Franklin Elementary
  - Golden grahams cereal bars- distributed by
  - Honey graham crackers- distributed by
  - Tartar sauce- made in the USA
  - Salsa- distributed
  - Fruit punch- OH
  - Applesauce cups- distributed by
  - Apple slices- produced MI
- Lincoln Elementary
  - Appleways Blueberry Lemon Bites- IN
  - Cheez-It- distributed
  - Mustard- made in the USA
  - Tartar sauce- made in the USA
  - Red wine vinegar- MD
  - Applesauce cups- distributed by
- East High School, Wausau Alternative High School, PEER
  - Wheat crackers- distributed by
  - Cereals- distributed by
  - Sour cream- for distribution
  - Teriyaki- produced by
  - Herbs and spices are all- distributed by or packaged by
  - Bush's Beans- no information
  - Diced strawberries- manufactured by
  - Richland Farms, apples- produced by

In USDA Memo SP 38 -2017, any product that does not identify the country of origin requires certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products.

### *Achieving Buy American Compliance*

- 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 percent 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.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (<https://dpi.wi.gov/school-nutrition/procurement/procurement-manual>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### **Findings and Corrective Action Needed: Buy American**

❑ **Finding #1:** The following products were identified in Wausau School District's storage area as non-domestic:

- Canned pineapple- product of Thailand
- Canned pineapple- product of Indonesia
- Canned mandarin oranges- product of China
- Olive oil- product of Italy, Spain, Tunisia, Morocco, and Turkey
- Bananas- product of Costa Rica
- Avocados- product of Mexico
- Bananas- Guatemala

Wausau School District does not have a Buy American – Non-compliant List or SFA equivalent form for these products.

**Corrective Action Needed:** Begin using Non-compliant Product List forms or SFA equivalent for tracking non-domestic products. Provide a copy of a completed form for the non-compliant product currently in Wausau School District's food storage areas. Provide the completed form as corrective action. The [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx) is located on the Buy American Provision webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx>).

### **Professional Standards**

### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

### Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A [template tracking tool](#) is posted to our [Professional Standards](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

### Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

### **Findings and Corrective Action Needed:**

- ❑ **Finding #1:** Trainings are being tracked for some staff members involved with the School Nutrition Programs, but not all.

**Corrective Action Needed:** Update the tracking tools to include this information. Use the [DPI tracking tool](#) to track trainings (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>). **Submit a copy of the updated tracking tools.**

### Food Safety and Storage

#### Commendations

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.

#### Technical Assistance

- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.

### Time/Temperature Control for Safety (TCS) Food

Milk and dairy products

Shell eggs

Meat (beef, pork, and lamb)  
Poultry  
Fish  
Shellfish and crustaceans  
Baked potatoes  
Heat-treated plant food, such as cooked rice,  
beans, and vegetables  
Tofu or other soy protein

Sprouts and seed sprouts  
Sliced melons  
Cut tomatoes  
Cut leafy greens  
Untreated garlic-and-oil mixtures  
Synthetic ingredients, such as textured soy  
protein in meat alternatives

### Time as Public Health Control

- When using “Time as a Public Health Control”:
  - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
  - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
  - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

### Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Lincoln and Franklin Elementary schools were missing an SOP for Time as a Public Health Control.

**Corrective Action Needed:** Add a SOPs for Time as a Public Health Control to reflect site-specific procedures at both sites. **Corrected on-site. No further action required.**

- ❑ **Finding #2:** Franklin Elementary school classrooms that participate in Breakfast in the Classroom are keeping leftover breakfast items for snacks later in the school day. No SOP on file for Sharing Tables. Some items saved include Benefit Bars with must be kept under refrigeration.

**Corrective Action Needed:** Submit a statement of how you will handle leftovers from Breakfast in the Classroom. If you plan to allow sharing tables within the classrooms, submit a copy of the site specific Sharing Table SOP for Franklin Elementary including how staff will monitor all wholesome leftovers for snack service.

### Reporting and Recordkeeping

#### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

- There are additional record retention rules for CEP. “LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

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

#### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

- The SFA is doing a wonderful job notifying families of the availability of the breakfast program through communications during the school year.
- The SFA operates the Summer Food Service Program each summer at a select number of sites.

## **5. OTHER FEDERAL PROGRAM REVIEWS**

### **Afterschool Snacks**

#### **Commendations/Comments/Technical Assistance/Compliance Reminders**

- Each site participating in the Afterschool Snack Program needs to have an onsite monitoring review completed within the first four weeks of operation, and a second review within the school year. The review form to complete may be found on our [Afterschool Snack Program](http://dpi.wi.gov/school-nutrition/after-school) webpage (<http://dpi.wi.gov/school-nutrition/after-school>).
- Each afterschool snack location is required to maintain documentation supporting that reimbursable meals were provided to students, including production records with snack items and serving size. Menus are not required, but encouraged. Production record examples are found on the afterschool snack program webpage linked above.
- [Snack Count Sheets](#) and [production record templates](#) are located on the Afterschool Snack webpage (<http://dpi.wi.gov/school-nutrition/after-school>).

### **Findings and Corrective Action Needed: Afterschool Snack Program**

- Finding#1:** On-site monitoring of the Afterschool Snack Program was not completed.

**Corrective Action Required:** Complete the on-site monitoring form for this program and provide the completed form and provide a statement of understanding that this is required twice per year, the first within the first 4 weeks of the program start date.

- Finding#2:**The check off sheets were not being used to submit the monthly claim. Afterschool Snack Program – Area Eligible site operators were checking students off and putting counts into a spreadsheet. The spreadsheet was being used for the monthly claims, but did not match the check off sheet counts.



**Corrective Action Required:** Fiscal action will be taken on the October 2018 ASP-AE claim. October was the first month of operation. Submit a statement of how you will ensure the monthly claims will have the correct snack counts.

### **Special Milk Program**

#### **Commendations/Comments/Technical Assistance/Compliance Reminders**

Month claim was consolidated correctly. No issues at this time.

### **Fresh Fruit and Vegetable Program**

#### **Commendations**

Thank you to Wausau School District for participating in the Fresh Fruit and Vegetable Program (FFVP)! A special thanks to the Food Service Director for providing documentation and answering questions for the claim validation. The FFVP monthly menu is a colorful addition to the program and provides a great message at the bottom.

#### **Technical Assistance**

##### *Program Promotion*

Promote the program by utilizing student address systems, monthly menus, newsletters, bulletin boards, etc. and encourage cooperation and commitment from administrators, teachers, parents, food service staff, school nurses, custodial staff, PTA, and student government.

##### *Nutrition Education*

Nutrition education should be included whenever possible and is required be offered on days when a cooked, fresh vegetable is offered.

#### **Findings and Corrective Action Needed: Fresh Fruit and Vegetable Program**

**❑ Finding #1:** Plastic bags were claimed under non-food items for \$55.06. According to the 9/11/18 invoice, two cases of plastic bags were claimed at \$27.53 per case for a total of \$55.05. The distributor's calculation of the total cost was different than Online Service's total cost calculation, resulting in an overclaim of \$0.01.

In the future, if Online Services total cost calculation differs from what is on the invoice, the total cost can be adjusted. Online Services will allow the total cost to be changed by adding a penny or by entering any amount that is less than the calculated total cost.

**Corrective Action Required:** Submit a written statement indicating understanding that the auto-calculated total cost can be adjusted in Online Services to match the invoice amount.

***Per DPI SNT, fiscal action will not be applied on this \$0.01 overclaim because it is less than \$1.00.***

"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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).”



*With School Nutrition Programs!*