

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

School Food Authority: Marinette School District

Agency Code: 383311

School(s) Reviewed: Merryman Elementary & Sunrise Early Learning Center

**Review Date(s): March 20-23, 2018
2018**

Date of Exit Conference: March 3/23,

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, 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).
- 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, and 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).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives

Thank you to the staff at Marinette School District for the warm welcome extended to us during the on-site review. We appreciate the Food Service Director answering our questions which greatly expedites this process. Thank you for being available and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. Finally, the meals were colorful and appealing to all students. The School Nutrition Professionals we worked with at both schools are very knowledgeable in their jobs, positive in their personalities, and it is obvious they are well trained in Offer vs Serve, and happy to be there. Thank you to all the Food Service Staff and Director for providing meals that meet the requirements of the USDA guidelines. Great job everyone!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

47 Applications were reviewed with 0 errors.

Commendations/Comments/Technical Assistance/Compliance Reminders

Thank you for providing all the necessary information to us in doing the Administrative Review. A great job was done on completing the application process and issuing the meal benefits.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

The Verifications Process was done well and very detailed.

Findings and Corrective Action: Verification

❑ Finding: One application was determined Free due to income, but also had case number and Foodshare listed. This application was randomly selected for Verification. When doing the verification process, the office assistant determined the information sent to verify Foodshare was not sufficient, and requested more information. The family failed to send it, and it then was determined to be non-responsive. The status for the family was changed from Free to Paid. The document that was originally sent by the family was a copy of their status of Foodshare from the county, and was found to be complete. During the Administrative Review Process, this mistake was found.

Corrective Action Needed: The document was determined to have been sufficient, and the family status should not have been changed. Please submit a statement stating that you have watched the Verification webcast on the DPI website, and understand the process.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance. The meal counting and claiming for the Review Month was done correctly.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of Marinette School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. During her first year in the role, the Food Service Director worked to build confidence and gain knowledge of program requirements with support from the District Manager. Nutritional quality and meal pattern documentation available onsite was thorough and organized. The Food Service Director responded promptly to questions and requests for additional information.

Special thanks to the school nutrition professionals of Merryman Elementary and Sunrise Early Learning Center. They care deeply about the child nutrition programs and for the students they serve. Kitchens and meal services operated efficiently and without incidents. The school nutrition professionals openly discussed achievements, pleasures, and challenges in child nutrition programs.

Technical Assistance and Program Requirement Reminders

Lunch Meal Service – Merryman Elementary

During lunch meal service observation on March 21 at Merryman Elementary, one school nutrition professional served the vegetable and entrée (grain, and meat/meat alternate [m/ma]) to students. Students self-served the milk and fruit. While all students observed selected reimbursable meals, ensuring students select three full components including 1/2 cup fruit and/or vegetable is imperative to program integrity.

Changing the entry point into the meal service area may create a better opportunity for the school nutrition professional to check trays for three full components including 1/2 cup fruit and/or vegetable. Maintaining the current entry point, the hot and cold items may be reordered to offer the entrée last. As the entrée is served by the school nutrition professional, she may check students' trays.

School Breakfast Program – Crediting

The strawberry Nutri-grain bar offered on the breakfast menu credits as less than 1.0 ounce equivalent (oz eq) of grain. This and similar items must be bundled with other items so at least 1.0 oz eq of grain is offered each day to meet the daily minimum requirement for grain, and so these items can be counted as an item for the breakfast meal pattern. An item at breakfast is defined as 1.0 oz eq grain, 1.0 oz eq meat/meat alternate (m/ma), ½ cup of fruit and/or vegetable, or 1 cup of milk. Under Offer Versus Serve (OVS), four food items must be offered at breakfast, and students must select at least three food items, including ½ cup fruit and/or vegetable to have a reimbursable meal.

Meal Pattern – Crediting

Crediting information recorded on the production records was not consistently in agreement with crediting information on the supporting documentation, such as CN labels, product formulation statements, standardized recipes, or the Food Buying Guide. Including meal pattern contributions for specified grade groups on production records is not required, though it must be documented.

Grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) of the USDA *Food Buying Guide* (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). If a product is not on Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the *grams of creditable grain* in the product. Divide this number by 16 grams per ounce equivalent to calculate the grain contribution for that product.

Two items on the breakfast menu at Merryman Elementary, the Trix cereal bar and the Crunchmania graham snacks, require PFSs to credit as the menu planner intends. Using Group D of Exhibit A, the Trix

cereal bar credits as 0.5 oz eq of grain; using the PFS from the manufacturer, it credits as 1.0 oz eq of grain. Likewise, using Group B of Exhibit A, the Crunchmania graham snacks credit as 1.75 oz eq of grain; using the PFS from the manufacturer, it credits as 2.0 oz eq of grain.

Product Formulation Statements

Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current CN label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients, based on entries in the *Food Buying Guide*; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson). Please note that product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

In-House Yield

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the school food authority's next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG (e.g. 2 ounce hash brown patties). [Specific and verifiable procedures](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf), which must be followed, are available on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy).

Watermarked CN Labels

A CN label with a watermark is used when the CN logo and contribution statement are used on product information other than the actual product carton and is presented as a separate document. Manufacturers may provide schools with a CN label with a watermark during the bidding process or on their websites. Original CN labels on product cartons will not have a watermark. Product information on the CN label with a watermark can be changed. CN labels must be verified and collected from boxes as products are delivered. Once labels have been collected, check when new shipments arrive to determine if crediting towards the meal pattern has changed.

Production Records

Be specific about the identity, brand, and description of the items served. Instead of "Assorted Chilled Fruit" or "Assorted Fruit Juice," list the specific type. Those descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records to accurately reflect portion sizes and crediting. Fruit sizes (e.g. case count) should also be recorded.

Signage

Signage must state that student must take at least 1/2 cup fruit, vegetable, or combination to constitute as a reimbursable meal. This statement was missing from signage at Merryman Elementary and Sunrise Early Learning Center.

School Breakfast Program signage for breakfast in the classroom incorrectly states students "may choose to take milk and/or fruit." This language implies milk and fruit are the same component and that students may not be able to select both.

School Breakfast Program signage states, "...choose a fruit and at least 2 other breakfast items." National School Lunch Program signage states, "...select at least 3 foods with 1 or more being a fruit or vegetable." Neither sign requires 1/2 cup of fruit, vegetable, or fruit/vegetable combination.

Special Dietary Needs

Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide the nutrition information from the product you will be using.

Corrective Action

Meal Pattern Finding #1: The weekly minimum requirement for meat/meat alternate (m/ma) was not met for lunch during the review period at Merryman Elementary. A 1.0 ounce equivalent (oz eq) string cheese was planned but not offered or served on February 6, according to production records. The weekly minimum requirement is 8.0 oz eq. 7.25 ounce equivalents were offered, resulting in a 0.75 oz eq shortage of m/ma.

Required Corrective Action: Please submit a statement describing how you will meet the weekly minimum requirement going forward.

Meal Pattern Finding #2: The daily minimum requirement for vegetables was not met for lunch during the review period at Merryman Elementary as a result of a 2.0 ounce hash brown patty offered on February 6. According to the Food Buying Guide, a 2.25 ounce hash brown credits as 1/4 cup of starchy vegetable; therefore, a 2.0 ounce hash brown credits as 1/8 cup of starchy vegetable. The daily minimum requirement is 3/4 cup. 5/8 cup was offered, resulting in a 1/8 cup shortage of vegetables.

Required Corrective Action: Please submit a statement describing how you will meet the daily minimum requirement going forward.

Meal Pattern Finding #3: The daily and weekly minimum requirements for fruit was not met for breakfast during the review period at Merryman Elementary as a result of a 2.0 ounce package of apple slices served on February 9. According to the Food Buying Guide, 1.1 ounces of apple slices credit as 1/4 cup of fruit; therefore, 2.0 ounces of apple slices credit as 3/8 cup of fruit. The daily minimum requirement is 1 cup. 7/8 cup was offered, resulting in a 1/8 cup shortage of fruit. The weekly minimum requirement is 5 cups. 4 7/8 cups were offered, resulting in a 1/8 cup shortage of fruit.

Required Corrective Action: Please submit a statement describing how you will meet the daily and weekly minimum requirements going forward. Alternatively, complete an in-house yield and submit the results.

Meal Pattern Finding #4: The required 1/2 cup fruit, vegetable, or fruit/vegetable combination statement is missing from signage.

Required Corrective Action: Add a statement to your current signage stating a student must select at least 1/2 cup fruit, vegetable, or fruit/vegetable combination as part of his or her reimbursable meal.

Submit a photo of updated signage. A suggested template is found on the [Buy American webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) under Buy American Noncomplaint Product list (word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Nonprofit School Food Service Account

- How to locate the agency's Child Nutrition program Report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast is listed below. The Aids Register also shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

Annual Financial Report (AFR)

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance."
- 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 "Purchases Services" you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under "Ala Carte," you should be reporting 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 would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to 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 a food expenditure.

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.

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>).

Findings and Corrective Action: Nonprofit School Food Service Account

❑ **Finding:** On the Annual Financial Report, the Labor portion is not broken out, therefore showing all zeros. Those dollars are listed under Purchased Services.

Corrective Action Needed: Submit a statement stating that going forward, the Labor Costs will be broken down and listed on the Labor Expenditures column of the Annual Financial Report, per the link listed above for the 16-17 Annual Financial Report Instructions on the DPI website.

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

Thank you for completing the PLE tool correctly.

Indirect Costs

Commendations/Comments/Technical Assistance/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 on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. 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 district's total.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).
- However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, **"This institution is an equal opportunity provider."** Both statements should be in the same size font as the other text in the document.

And Justice for All Poster

- "And Justice for All" posters need to be posted in public view where the program is offered.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31, annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

Technical Assistance was provided regarding the Non-Discrimination statement on the bottom of the menu. It should read: "This institution is an equal opportunity provider."

On-site Monitoring

Commendations/Comments/Technical Assistance/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 by February 1.
- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo [SP 56-2016](#) (<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>).

- The onsite 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>).

FSMC

- Duties that may not be delegated to the FSMC include:
 - On-site Monitoring
 - Signature Authority
 - Edit Checks – if they are software-generated, the SFA must sign off on them

On-site Monitoring

Onsite Monitoring is being done and recorded per the requirement.

Local Wellness Policy

Commendations/Comments/Technical Assistance/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 2016-2017 and full compliance with the requirements 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 each school complies with the policy.

- 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>).

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 [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).

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). 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>).

SFA is required to make the Local Wellness Policy available to the public and public must be informed of updates to policy (1001)

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform the public about the content, implementation of, and updates to the LWP annually. Your SFA did not notify the public regarding updates to the LWP. SFAs may use a variety of methods to notify the public about the LWP and its updates. This may include mailing flyers, newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification.

SFA is required to review and update Local Wellness Policy (1002)

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. Additionally, your SFA does not have documentation indicating when and how the plan is/will be reviewed and updated.

SFA is required to have a committee of diverse stakeholders and/or a roster of those involved (1003)

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. SFA wellness committees should include a diverse team of committed school and community stakeholders. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.

SFA is required to inform potential stakeholders of their ability to participate in the Local Wellness Policy (1004)

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of 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>).

SFA is required to complete an assessment of the Local Wellness Policy (1005)

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your schools report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](http://wellsat.org/)) for assistance in assessing the LWP (<http://wellsat.org/>).

SFA required to inform the public of the results of the most recent assessment (1006)

Technical Assistance for 1006, if do not have a policy: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. Following the assessment SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. It is recommended SFAs include a plan to improve upon the results of the assessment.

Technical Assistance for 1006, if do have a policy: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails,

website postings, and newspaper articles. It is recommended SFAs include a plan to improve upon the results of the assessment.

Findings and Corrective Action: Local Wellness Policy

❑ **Finding:** The SFA's Local Wellness Policy has not been updated since it was created in 2006. It needs to specify the required components of the LWP to include: policy leadership, public involvement, school meals meeting regulations, foods sold outside of the school meal programs, foods provided but not sold, food and beverage marketing, goals for nutrition education, nutrition promotion and physical activity. Other school-based strategies for wellness, triennial assessment and to inform the public of wellness policy updates and implementation. The wellness policy resources from DPI have valuable items such as the Wellness Policy Builder and the Wellness Policy Checklist.

Corrective Action Needed: Please provide a timeline for meetings and updating your policy to include all the necessary components and become compliant with the final rule.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program "director." A program "director" is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

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, 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](http://dpi.wi.gov/school-nutrition/training/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: Professional Standards

Finding: Director and Staff have not completed the required training hours for the current school year and was unable to provide a training plan documenting the training.

Corrective Action Needed: Provide a training plan for meeting the required training hours.

Include all current training hours for Food Service Director and each food service employee onto the DPI tracking tool and submit as part of corrective action.

Water

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Commendations/Comments/Technical Assistance/Compliance Reminders

Water is readily available inside the cafeteria via a water fountain, and is available to all students.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

- The school nutrition professional at Merryman Elementary, has her ServSafe Certificate that is current and posted. Great job on completing it!
- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. Everything was in a neat and organized manner and the required 6" off the floor.
- Sunrise Early Learning Center has a well-organized cafeteria and meal program. The school nutrition professional there was very well trained in Offer vs. Serve, knew all the kids names, and if they did not have all the components on their tray, she gently encouraged them on taking the item missing, and the kids responded great to her. All meals served were reimbursable.

Buy American

There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. Cost analysis

- b. Seasonality- record the months that the domestic product is not available
- c. Availability
- d. Substitution- record the reason the distributor substituted the product
- e. Distribution- record the reason the distributor carries the non-domestic product
- f. Other- explain

You may record additional information if you find it beneficial.

A suggested template is found on the [Buy American webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) under Buy American Non-complaint Product list (word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

❑ Finding: The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Canned pineapple from the Philippines
- Canned black olives from Portugal
- Canned jalapenos from Mexico
- Canned mushrooms from the Netherlands
- Frozen cauliflower from Mexico
- Fresh cantaloupe from Guatemala
- Fresh pineapple from Costa Rica
- Fresh watermelon from Mexico
- Fresh strawberries from Mexico
- Fresh peapods from Guatemala

Required Corrective Action: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products.

Wisconsin School Day Milk Program

The Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals. But only for students in K-5th grades.

Technical Assistance – Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk, not by marking who “did not” take one. A best practice is that teachers bring the check-off sheet when the student selects the milk or as soon as the student returns to the classroom. **We do not allow a sheet to be pre-marked with students or to mark them during attendance for milk to be consumed later.**

Commendations/Comments/Technical Assistance/Compliance Reminders

Sunrise Elementary is participating in the Wisconsin School Day Milk Program

Findings and Corrective Action Needed: WSDMP

❑ Finding: The Point of Service is not correct. Counts are being taken early in the morning along with attendance and lunch counts. The milk is being distributed approximately 2 hours later from the refrigerator in the classroom.

Corrective Action Needed: There is no corrective action required due to the Wisconsin School Day Milk Program is being discontinued as of Friday, March 23, 2018 while we were still on-site. Breakfast in the Classroom will be started on March 26, 2018 which has milk included in the meal.

Technical Assistance was provided to both the teacher and principal at Sunrise Elementary regarding "Point of Service."

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

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

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

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
Phone: 608.266.7124
E-mail: amy.kolano@dpi.wi.gov

School Breakfast Program

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

❑ **Finding:** It was observed that third and fourth grades were picking up their breakfast bag meal from a cart in the entryway of the school. The students took the bag to their classrooms, put coats away, got settled, and then the teacher took attendance, and then did lunch counts, and also breakfast was checked off. This was approx. 10 minutes after the student picked up their breakfast. There is no point of service in the entryway of the school.

Corrective Action Needed: Change 3rd & 4th grade classes to “Breakfast in the Classroom.” This will allow a clean point of service as the teacher is already in there, and can monitor the students as well as check them off when they take their breakfast. Submit a statement of 2-3 sentences describing the structure of how the breakfast in the classroom is being done, and the point of service as well.

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program (SMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

The 4K students are receiving milk in the afternoon. The point of service is being done correctly as they are being handed the milk, and then being checked off by the teacher who checks their name off on a class roster sheet. She then enters that into Skyward. No further action needed.

We again thank everyone at the Marinette School District for their time and efforts in helping us complete the Administrative Review.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His 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>).

