

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Greendale School District

Agency Code: 40-2296

School(s) Reviewed: Greendale High School & College Park Elementary School

Review Date(s): 1/24-26//2017

Date of Exit Conference: 1/27/17

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 (AR) 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, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage 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 webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.

District Appreciation/Commendations/Noteworthy Initiatives:

Special thanks is extended to the following staff positions at the Greendale School District: Food Service Director; Food Service Secretary; Head Cook at the High School; Lead/Servers at the High School and College Park Elementary School. In addition thanks to the Business Office staff-Director of Business Services, Comptroller, and Accountant for the courtesies extended to us and for their time in completing the comprehensive financial review. We were especially appreciative of all the time spent to answer questions off site and for cooperatively pulling records/documentation needed for the on-site review. Staff were very receptive to recommendations and guidance. The Food Service Director and Secretary in particular did a very thorough job of answering the many questions on the *USDA Off-Site Assessment Tool*. The answers were easily validated during the on-site review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- Good documentation was on file in terms of receipt date of the meal application. Applications were processed in a timely manner. Direct certification has been completed to meet the required time frames, i.e. on or before the start of the school year, three month, and six month timeframe.
- Nice to see notes regarding contact made with the household on one of the applications that was blank or indicated “no income.”
- Good efforts to follow up with households reporting *annual income* to see if the income meets the criteria of seasonal or fluctuating and would qualify to be reported *annually*. Only those households with fluctuating income, e.g. seasonal workers or self-employed should report annual income. All others persons report *current income*, i.e. weekly, bi-weekly, monthly, etc. Also, nice to see notes made on the applications when it was necessary to clarify income or other information on the application.
- Good job to notify households that had not reapplied for meal benefits (or been directly certified) that the household benefits would be expiring.
- Determining official did a good job to ensure software uploads for those students that were directly certified was correctly completed.
- On a monthly basis the Determining Official cross checks the student information data base for withdrawals and uses the information to update the benefit issuance list in the food service software.

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- Be reminded that all contacts made with households regarding questions on the free or reduced price meal application should be *documented* (either directly on the meal application or in the “comments” section in the software). This is particularly important when the income reported on the application is *annual*. Households should only report annual income if the income meets the criteria of *seasonal or fluctuating*. The household can either project its annual rate of income, to report as current income. However, if the prior year’s income provides an accurate reflection of the household’s current annual rate of income, the prior year may be used as a basis to project the annual rate of income.
- We also discussed the need to document when an *extension of direct certification benefits* has occurred. The documentation includes who is extending the benefit.
- The district process to provide households with the f/r price meal application information at the beginning of each year is to post the information to the district’s website, AND to send all enrolled households that have do not have an email address or a blocked address with a paper copy of the application. This procedure is consistent with page 9 of the USDA *Eligibility Manual*. The email contains an attachment that includes the parent letter, instructions for applying, meal application, and sharing information form. The email also states how the household can obtain a copy of the application materials should the household need a paper

copy. Be reminded that any households enrolling students during the school year should be given a paper copy of the application information when they enroll their student.

We also recommend that you send a short paragraph regarding the above when the district's end of school year registration information is sent to households since it was the reviewer's understanding that this is a mailing sent to enrolled families via USPS. This would increase awareness of the free and reduced price meal application process.

Findings and Corrective Action Needed

Finding: A statistical sample was conducted to determine the number of meal applications for this AR. *Three hundred names* on the benefit issuance list were checked via review of meal applications or direct certification information. There was only *one meal application error* found. Excellent efforts were made by the Determining Official to correctly approve the applications and extend meal benefits for those students that were directly certified.

The error is summarized on the SFA-1 review form. A copy was left with the district during the review. The application was coded LO AM and ED AM. Two other school-age children live in the household but were not part of the statistical sample. The error was an inadvertent keying error that resulted in an incorrect determination of reduced price meals. Based on the income reported, the household is not eligible for any meal benefits.

Corrective Action Needed: The household was notified by telephone during the review and a letter sent on January 25, 2017 to formally explain the change in meal benefits. The household has been extended the required 10-calendar day timeframe to appeal the change in status for their children.

For corrective action please provide a screen shot and/or meal history for each child noted above to show that the change in meal benefits has occurred.

Fiscal action is determined for all *critical review* areas which pertains to certification AND benefit issuance errors. USDA has established a \$600 forgiveness before fiscal action is assessed. The results of the fiscal action will be indicated in the review closure report.

Verification

Commendations

Excellent efforts were made to use the *DPI Tracker Form* which documents the verification process. It was easy for the reviewer to follow the process thru from start to finish, i.e. selection; confirmation reviews; date letters of selection for verification were sent; follow-up attempts; review of the income documentation on file; and letters sent to households regarding results of verification. The *Verification Collection Report* was submitted well in advance of the February 1 due date and correctly completed. Great job by the Verifying Official all the way around!

Meal Counting and Claiming

Commendations

Review of the software meal count reports, edit check for each school, and enrollment/attendance information for the review period - December 2016 found no errors. Again, great job!

Cashiers are well trained at the high school to monitor each meal tray for a reimbursable meal. The staff did a very good job to encourage students to take a “reimbursable” meal where the price is cheaper than the ala carte prices.

A suggestion was made to the claim preparer to be sure to document the review of each school’s meal count data (called the *edit check*) in some way, e.g. initial and date. This is especially important when the calculation results in a potential over claim of meals using the attendance factor calculation which requires further investigation prior to submission of the monthly claim for reimbursement.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all staff at Greendale School District for a great administrative review. Thank you to the Food Service Director for sending documentation and answering questions onsite. The binders of recipes, nutrition facts labels, CN labels, Product Formulation Statements (PFS), and Smart Snacks Calculator print-outs were well organized and thorough. Staff at Greendale High School and College Park Elementary were well trained in Offer versus Serve (OVS) and had great rapport with students. They worked efficiently together, cooking many nutritious options and stocking a la carte items in a timely manner. The signage at both the high school and elementary school were nicely done, showing what options students may select and how to build a reimbursable meal. Great addition of a seasoning/herb station, which encourages students to add flavor to their meals while staying within the sodium limits. The Food Service Director and kitchen staff do a great job with condiment control. This ensures students are remaining within the appropriate calories, fat and sodium limits per age/grade group. The breakfast/lunch brochure is also a great addition to the program with visually-pleasing colors and pictures.

Greendale School District is going *above and beyond* by having a school garden at each site. The district plants kale, tomatoes, watermelon, lettuce, butternut and spaghetti squash, zucchini, basil, cilantro, strawberries, pumpkin, cherry tomatoes, pepper, carrots, eggplant, beets, radishes, and flowers for arrangements at the farmer’s market. Some of the produce is even used in the lunch program, with basil added into pasta sauces, cilantro into black bean and corn salad, kale for kale chips, and fresh fruits and veggies out on garden bars. Greendale School District also does thousands of pounds of composting. A truly commendable job with promoting healthy eating and living green!

Technical Assistance:

Serving Sizes: For the cheese stick served at the Elementary school, the serving size was 1 or 2. As the menu planner, and to reduce confusion, pick either 1 or 2 cheese sticks for the serving size on specific days.

Smart Snacks: DPI's Smart Snacks "In a Nutshell" with updated requirements can be found: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>

USDA Quantity Recipes: For more recipe ideas, USDA's What's Cooking Mixing Bowl Recipes, with updated crediting information, can be found: <https://www.fns.usda.gov/usda-standardized-recipe>

Findings and Corrective Action Needed

Finding #1: All a la carte items sold during the school day must meet Smart Snacks Regulations. An update to SY 2016-17 is the sodium standard for snacks/sides, which is now less than or equal to 200 mg (reduced from less than or equal to 230 mg). The Oven Baked BBQ Chips offered as an a la carte item were found to be non-compliant as they had 220mg of sodium.

Corrective Action Needed: Please submit a label for a Smart Snack compliant snack. **It was determined that these would be taken off the ordering guide and will be discontinued. No further action required.**

Finding #2: There was a weekly grain shortage for College Park Elementary for the week of review. All reimbursable meal options for the week must meet the weekly requirements. If the following combination of options were chosen, a student would not have access to the minimum requirement of weekly grains:

Monday: Bistro Box – 1 oz. eq. grain

Tuesday: Any of the options – 2 oz. eq. grain

Wednesday: Bistro Box – 1 oz. eq. grain

Thursday: Any of the options – 2 oz. eq. grain

Friday: Bistro Box – 1 oz. eq. grain.

This would be a total of 7 oz. eq. grain, which is a shortage of 1 oz. eq. grain. The weekly requirement for the K-5 lunch meal pattern is 8 oz. eq. grain.

Corrective Action Needed: Please state what will be added to the week of review so that a total of 8 oz. eq. of grain is offered. **The Food Service Director will add whole grain-rich Cheezits, which credit as 1 oz. eq. to the Bistro Box on Wednesday. This will increase the weekly grains to 8 oz. eq. grain. No further action required.**

Finding #3: Food products and ingredients used to prepare school lunches must contain zero grams of trans fat per serving (less than 0.5 grams per serving) according to each product's nutrition label or manufacturer's specifications. If it is likely that trans fat appearing on a label is naturally occurring, the school food authority (SFA) must request documentation from the manufacturer that reports the source of the trans fat prior to continuing use of the product. All products containing synthetic trans fats must be discontinued immediately. The Margarine contains 3.0 grams of trans fat. All foods served in the National School Lunch Program must contain 0 grams of trans fat.

Corrective Action Needed: Please submit a nutrition facts label for a new margarine that contains 0 grams trans fat.

3. RESOURCE MANAGEMENT

Comments/Technical Assistance/Compliance Reminders

- REMINDER: SFAs are required to have a *local meal charge policy* in place no later than July 1, 2017. More information, resources and best practices may be found on the School Nutrition Team <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section. For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

The district does not *currently* have an unpaid meal charge policy but is aware of the requirements and has plans to begin work on the policy. Specifically be sure the district policy includes a reference to debt collection and refunds. Refunds must be made for students that receive *Reduced Price* meal benefits when the student withdraws or leaves the district. For students in the paid meal category the district has discretion to determine if refunds will be made and at what dollar amount. Refer to page 32 in the Unpaid Meal Charge Guidance referenced above.

USDA has established four areas for compliance in the *Resource Management* area. A series of questions related to: Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, and Indirect Costs was sent to the SFA at least 4 weeks prior to the AR. Based on the answers the school triggered what is called a *Comprehensive Review*. For the district a comprehensive review was conducted in two areas: *Maintenance of the Nonprofit School Food Service Account* and in the *Revenue from Nonprogram Foods* area.

During the onsite Resource Management portion of the AR the *Paid Lunch Equity* (PLE) tool was discussed, including the district option to request a waiver from increasing paid student meal prices related to keeping the food service program fund balance within the allowable limits (i.e. 3 months' average expenses). Please feel free to contact DPI if you need assistance running the 2017-18 PLE tool or would like to discuss the PLE Exemption Request/process, <http://dpi.wi.gov/sites/default/files/imce/forms/doc/f1478.doc>.

Maintenance of Nonprofit School Food Service Account

This area was triggered for a comprehensive review since the food service account fund balance exceeds three months' average operating expenses for the fiscal year 2015-16. The district will receive a letter soon from DPI to indicate the excess balance. Since this is the first year that the district will receive the excess balance letter the district will just be informed of the balance requirements and provided some suggestions for reducing the fund balance. This should not continue to be an issue since the district was aware of the fund balance excess and has made two significant

equipment purchases during the 2016-17 SY. Thank you and continue to monitor the fund balance each year.

Comments/Technical Assistance/Compliance Reminders

Journal entries were reviewed for a one-month reference period and it was noted that a charge was made to the food service account for water provided to one of the elementary schools. The water was needed since the school's water supply was found to be contaminated for a period of time last spring. This charge should have been a District or Fund 10 expense. Though it was a small expense, the recommendation was made that approval for food service program expenses should be made only by the Food Service Director position. It was also recommended that the foods service director be provided with accounting *detail* for her periodic review of *appropriate* food service program expenses.

Findings and Corrective Action Needed

Finding: It was determined that a percentage of the district aide time (elementary schools) was charged to the food service account. Since this position performs duties across a number of program areas in the district it is considered an *indirect cost* and is not allowable as a charge to the food service account.

Corrective Action Needed: The aide labor expense can be considered an allowable expense if a *time study* is completed. Upon completion of the time study a comparison to the current time charged to the food service program should occur. If there is a discrepancy, a fund transfer will be required to refund any inappropriate charges made to the food service account (Fund 50) for the SY 2015-16 and SY 2016-17 to date.

For corrective action provide a summary of the results of the time study and the comparison to current labor time charged to Fund 50. NOTE: This may require an adjustment to your SY 2015-16 SY audit. Audit adjustments still can be made to DPI audits until late February or early March.

Revenue from Nonprogram Foods

Comments/Technical Assistance/Compliance Reminders

The Healthy Hunger Free Kids Act of 2010 established requirements regarding revenue from the sale of nonprogram (NP) foods (formerly referred to as *ala carte*). All revenue from the sale of NP foods must accrue to the nonprofit food service account, and revenue available to support the production of reimbursable school meals cannot subsidize the sale of nonprogram foods.

Nonprogram foods include any non-reimbursable foods and beverages purchased using funds from the nonprofit school food service account, such as adult meals, food sold outside of school hours, or any food used for catering or vending activities. For the Greendale School District nonprogram foods/beverages include: adult meals, catering, and ala carte or non-program food/beverage sales during the meal programs.

Compliance for all nonprogram food/beverages is determined if the percent of total revenue generated from nonprogram food sales is equal to or greater than the percent of total food costs for nonprogram

foods. USDA allows schools to use a simplified approach to determine compliance, by selecting a reference period (5 consecutive days). SFAs will separate nonprogram food costs from their program food costs for the 5 day reference period. DPI has created a tool to assist schools in meeting this requirement, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>. The DPI tool can also assist SFAs in pricing nonprogram foods and calculating total nonprogram food expenses and revenues and total program expenses and revenues for the designated reference period. This data then pulls into the USDA *Nonprogram Food Revenue Tool* comparing revenue and food cost ratios to measure compliance.

The tool has been completed by the district and showed that costs for nonprogram foods are being covered. In the future be sure to separate adult meals into breakfast and lunch since there are two different meal prices and costs.

Reminder: schools must complete the USDA or DPI tool *annually*, similar to the PLE tool.

#1- The revenue tool and a sampling of journal entries and invoices showed that most revenues and expenses are being appropriately charged to the nonprogram food account. Invoices are noted as *Nonprogram Foods*. It might be easiest to determine the average food cost of *all extra entrees* sold and multiply that by the total number of extra entrée sold (obtained from the daily activity sales reports) at the end of the school year. This will capture all entrée sales. The accountant can then make an adjusting entry to move the food costs from the lunch or breakfast meal programs to the nonprogram foods when completing the food service program annual financial report. The same recommendation is made for any “catered meals”, e.g. back to school staff breakfast. Both the revenue and food expense must be recorded as a nonprogram food on the financial report.

#2- We discussed for the annual food service program financial report that **Student Meal Account Payments (Paid and Reduced-Price)** are only considered revenues when the meal is “sold”. Refer to the DPI instructions for completing the annual food service program financial report, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>.

#3- The district has good cash collection procedures in place; cashiers collect money for meals and ala carte and enter into the student accounts. At the end of the day the food service director does the close out of each computer at the high school and completes the deposit slip. A courier take the money to the bank daily and deposits slips are reconciled with the bank statements by financial staff at the district.

Findings and Corrective Action Needed

Finding: During the off-site portion of the review it was determined that the adult lunch meal price (breakfast price was fine) was not consistent with the USDA Adult Meal Pricing calculation or not high enough when the cost of the meal and the current meal charge was included in the Nonprogram Foods Revenue tool. The *WI Adult Meal Pricing Guide* is found on the website, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>.

Corrective Action Needed: The district took action to raise the adult lunch price to a level (\$4) consistent with the regulation effective at the start of the second semesters (1/24/17). Further the

district now is aware of the need to complete the calculation each year and as needed to increase meal prices. **No further corrective action is required.**

Be reminded that the **revenue and expense** for all non-reimbursable adult meals will be reported on the *NEW* Food Service Program financial report (referred to above under Nonprofit School Food Service Account) as a nonprogram food expense and revenue. Schools no longer report the number of nonreimbursable meals on the monthly reimbursement claim.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

The district opts to use the USDA Free/Reduced - *Sharing Information with Other Programs* form. The form is included with the meal application materials. Households check a box giving permission to share their student's free or reduced meal information with other programs for the purpose of obtaining a fee waiver. The Food Service Secretary has created a spreadsheet that lists the program and names of students that can receive fee waivers. No other eligibility information is shared with district personnel. It was recommended that the Disclosure Agreement be signed by those individuals receiving the names of the students eligible for fee waivers. This information must be used only for the purpose of the fee waiver. The form is located on the website, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.

In terms of access to eligibility information food service cashiers also do not have *rights* to a list of eligible students within the food service software, except when entering funds into the student's food service account. For a brief moment the screen does indicate if the student is free or reduced.

Good efforts overall to protect the confidentiality of free and/or reduced students!

Comments/Technical Assistance/Compliance Reminders:

Special Dietary Needs

Information regarding food allergies and disabilities including the student allergy and disability form is posted to the district's website. Some of the language is not consistent with changes to the Americans with Disabilities Act (ADA) and how it affects the school nutrition programs.

Until recently regulations only *required* schools to make meal accommodations if a licensed medical professional provided documentation to establish that the student has a *disability*. Recent passage of the ADA Amendments Act, considers most physical and mental impairments to constitute a disability. So rather than focus on whether or not the student has a disability, schools should now focus on ensuring equal opportunity to participate in the meal programs. Refer to this USDA policy memo, <http://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs>.

If accommodations are made without out a medical statement the student must be offered all meal pattern components and select at least three (this includes selection of at least ½ cup fruit or vegetable) per your offer versus serve policy.

DPI has updated the *Dietary Request* form to meet modified requirements regarding accommodations for students with special dietary needs since medical authorities no longer need to check a box to indicate if the child’s medical condition is a “disability.” The form will still require the medical authority to indicate the following: types of foods to be avoided, a list of foods to be substituted; and require a description of the modifications needed to accommodate the child’s needs. If the form is completed by a medical authority the school will be required to meet the student’s dietary needs/meal accommodations. The district should replace the form that is currently posted to your website or modify your form.

We recommend that the district compare your policy to the USDA guidance and a newly created DPI Q/A, then update the language in the policy referenced above to be consistent with these changes. The form and Q/A can be found on the website, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>, and <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/q-and-a-sp-59-2016.pdf>.

Findings and Corrective Action Needed

Finding/Corrective Action Needed: *Public release* outreach for the NSLP was not fully completed as required. The public release is sent to the district Communications Director (CD) for publication in the community newspaper Greendale NOW. However, the additional community or grassroots outreach was not completed as required. During the review we discussed possible grassroots organizations in the area: local library-Parks and Rec, and possibly a local church. Check w the CD for other media and community outlets that the district uses to advertise school district news.

For corrective action, submit a statements on your public release procedure for the future. Please maintain documentation of where the release was sent to along with the specific materials distributed. Be sure to keep copies of email documentation sent.

Onsite Monitoring Reviews

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 onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review has been developed, both are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-onsite-monitoring.doc>, and <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc> for the breakfast program.

For the SY 2016-17 the Food Service Manager has completed the on-site reviews for both of the reviewed schools and some of the reviews in other district schools. The plan is to finish the reviews next week. Thank you.

During the review we specifically discussed the scope of the “readily observable” or general areas on the monitoring form since these are new. Refer also to the information regarding the General areas of the Administrative Review posted to the website if further clarification is needed for evaluation in each of these areas, <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>. (Scroll down to the area: General Program Compliance.)

It is a recommendation that the Director of Business Services or designee assist the Food Service Director with the completion of the *Resource Management* portion of the reviews next school year.

Local Wellness Policy Summary for Administrative Review

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 of 2010 (HHFKA). 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*.

Language should be added to district wellness policies to 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.

Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for School Meal Nutrition Standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

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 process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several

wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

DPI has created a Local Wellness Policy Checklist which was used to compare the district's current policy against the WP regulation/requirements. The checklist will be sent to the district after the review. Please consider these recommendations for additional update of the district policy before July 1, 2017.

The district had an active wellness committee which within the last year plus has been eliminated, due staff changes. The district was aware of the need to update the wellness policy and two staff attended the DPI Wellness Summit last fall. Great efforts! A plan is in place to begin review of the wellness policy with completion set for July 1.

Smart Snacks in Schools

Commendations

With the exception of the item noted in Section 2 – Corrective Action #1 above the district food/beverage sales were found to be Smart Snacks compliant at the two reviewed schools. Thank you.

Professional Standards (PS)

The Healthy Hunger-Free Kids Act of 2010 amended 7 CFR Parts 210 and 235 of the regulations to institute hiring standards for the selection of State and local school nutrition program directors and requires *all personnel* in the school nutrition programs to complete annual continuing education/training. These regulations are expected to result in consistent, national professional standards that strengthen the ability of school nutrition professionals and staff to perform their duties effectively and efficiently. These regulations took effect July 1, 2015.

Commendations

The food service manager has done a good job to document training for the SY 2015-16 and SY 2016-17 for herself and all food service staff in the district. She has documented training efforts and has maintained a file of all training attended. She also continues to monitor that the staff are meeting the training requirements per their respective PS category.

Food Safety, Storage and Buy American

Food Safety Inspections

Comments/Technical Assistance/Compliance Reminders:

Every school operating USDA School Child Nutrition Programs, must have two food safety inspections during each school year, one in the fall of the school year, which is an actual Food Safety Inspection, and the inspection in the spring is typically a review of the site's Food Safety Plan. Food safety inspection reports are required to be posted in public view.

The food safety (fs) plans at each school were reviewed and were current. We discussed removing Process 3 references and applicable Standard Operating Procedures (SOP) from the elementary school food safety plan, since this school does not have reheat capabilities.

Please discuss correct procedures for replenishing food with all food service staff. A clean container should always be used. In the case of fruit which is often replenished during meal service back-up containers should be ready in the coolers. The remaining fruit can be placed on top of the container with the new fruit.

Nice job of proper manual dishwashing procedures at the elementary school. The server was meticulous about removing food from the lunch trays before they were actually washed, rinsed and sanitized. She also followed correct procedures for sanitizing trays and pans.

Findings and Corrective Action Needed:

Finding/Corrective Action Needed #1:

The server at the Elementary School visited was not aware that the most recent inspection report needed to be publicly posted. Only the second inspection from last school year was posted. The Food Service Director had sent the inspection report to be posted, but it could not be located. A second copy was sent to the school during the review. **No further corrective action is requested.** Thank you.

Finding/Corrective Action Needed #2: At the elementary school the milk was removed from the milk cooler and the individual cartons placed on a table next to the cooler. We assumed this practice was done due to the age of the students and to limit dropped lunch trays. Removing the milk from the temperature control and then putting it back in the cooler between meal periods has the potential of increasing the bacteria load of the milk. The best practice is for the student to put his/her tray on the table and reach into the milk cooler to select the milk. Or, ice sheets can be used but the Food Service Director will need to work with your local health inspector to modify the milk bag SOP. Tempering the milk is still required and this has not been done.

Please review these corrective action suggestions above and submit statements of how the milk temperatures will be properly maintained.

Buy American

Comments/Technical Assistance/Compliance Reminders:

Regulations took effect with the start of the 2016-17 SY for the *Buy American provision*. This provision requires SFAs to purchase, to the maximum extent practicable, *domestic agricultural commodities or commercial food products*. “Domestic Commodity or Product” are defined as an agricultural commodity that is produced in the United States and a food product that is processed in the United States using substantial agricultural commodities that are produced in the United States. “Substantial” means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowed under this provision as territories of the United States.

The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs. 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. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

The district is part of a Buying Coop and the bids/Request for Proposals contained Buy American language. The Coop might want to add some additional assurances to the next prime vendor bid in the case of noncompliance.

The AR requires the State Agency to assess compliance by checking 1-2 items in a variety of food categories. *Products checked were compliant.* Note however, some products will not be grown domestically, such as pineapple and mandarin oranges. The food service director should work with distributors to see if these products are available domestically. If they are not, document this on the Non-compliant Product List, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>.

Note: The use of this form is the exception, not the rule. I encourage the Food Service Director to read what is posted about Buy American on the website, <http://dpi.wi.gov/school-nutrition/procurement/buy-american>. You might also read thru the USDA memo, SP24-2016, <http://www.fns.usda.gov/sites/default/files/cn/SP24-2016os.pdf>.

If there are additional questions about Buy American the food service manager should ask them during the upcoming procurement review.

Summer Food Service Program Outreach (SFSP)

Comments/Technical Assistance/Compliance Reminders

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Greendale School District 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](#) on the **DPI Summer Meals website**
 - 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 website
<http://www.fns.usda.gov/summerfoodrocks>

Near the end of this school year, it can be a simple paragraph in the district newsletter sent home to students, or putting up free posters and/or mail these items free of charge. For more information on the SFSP contact:

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Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. 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 webpage dpi.wi.gov/statesupt/agenda-2017.

