

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

School Food Authority: Early View Academy

Agency Code: 40-2712

School(s) Reviewed: Early View Academy

Review Date(s): December 19-20, 2018

Date of Exit Conference: December 20, 2018

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) 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 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.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Early View Academy of Excellence for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness and willingness of the staff to make changes to meet school nutrition program regulations. The DPI review team is confident that Early View Academy of Excellence will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance (TA)/Compliance Reminders

Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available. **SFAs must annually distribute the Public Release to:**
 - **Local news media**
 - **Grassroots organizations (local organizations providing services to populations in need)**
 - **Major employers contemplating or experiencing large layoffs**
 - **Local Unemployment Office (as applicable)**
- A [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility), (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>) specific to CEP schools, is available on the DPI CEP website.
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Direct Certification

- For CEP schools, two DC runs, at a minimum, must be completed during the school year. The runs should include full enrollment by school code (only list students with access to at least one meal per day). One run should be completed by October 31st and the second by April 1st.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** Public release not sent to media.

Corrective Action Needed: Please provide a statement of understanding indicating that the public release will be sent annually, at the beginning of the school year, to 3 outlets: media, grassroots organization and major employer or unemployment office.

Meal Counting and Claiming

Comments/Technical Assistance (TA)/Compliance Reminders

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- **A review of the meal counting and claim for the Review Month was conducted. Several errors, resulting in underclaims for both breakfast and lunch were noted. The CEP established free claiming percentage is used correctly.**
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.
- **When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.**

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #1:** Meal count consolidation errors identified in reviewing the lunch and breakfast claims for the month of review, resulting in underclaims.

Corrective Action Needed: 1. Please submit a statement of understanding of the importance of accurate claim consolidation. 2. Please submit to reviewer: all tally sheets for lunch, breakfast and snack, the corresponding Excel count spreadsheets and the edit checks for month of December, prior to submitting December claim.

- ❑ **Finding #2:** Inaccurate counting and claiming due to all meal components not available before the Point Of Service/checker.

Corrective Action Needed: Correct the error. Beginning on January 2, 2019, please submit 30 consecutive days of **accurate data/counts** for lunch and breakfast: checkoff sheets, consolidated count sheets and edit checks. [DPI template edit check](#) for CEP schools must be used. Fiscal action will

be calculated from the beginning of the school year, but there is a \$600.00 disregard per program before fiscal reclaim is necessary.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

Thank you to the staff of Early View Academy of Excellence for their time and cooperation during the Administrative Review. A special thanks to the Food Service Director for submitting documentation prior to the on-site review and answering questions. The school nutrition professionals work well together and with the students. We appreciate your hard work and dedication to your School Meals Programs!

Technical Assistance:

Crediting Foods in School Meals Programs

The [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) for School Meals Programs contains yield and crediting information for foods with standards of identity, in large part, unprocessed foods (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Foods that do not have standards of identity are not listed in the *USDA Food Buying Guide* and require further documentation, such as a Child Nutrition (CN) label or a product formulation statement (PFS) clearly detailing the ingredients and their creditable quantities, in order to be served in School Meal Programs.

A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that includes these four things.

When a CN label is not available for a product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is required that this documentation is printed on company letterhead and signed by an appropriate person.

If USDA Foods are utilized, [USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets) can be used as crediting documentation (<https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>).

Grain products can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). If a product is not listed in Exhibit A, you must obtain a signed PFS from the manufacturer that lists the *grams of creditable grain* in the product.

If a product does not have a valid CN label, PFS, USDA Foods Product Information Sheet, cannot be found in the *USDA Food Buying Guide* for School Meal Programs, or cannot be credited using Exhibit A, it may not be credited when served as part of the USDA School Meal Programs.

Crediting Documentation Provided to Food Service Director

The Public Health Nutritionist provided Product Formulation Statements to the Food Service Director for the following menu items served during the week of review and credited as such for the purposes of the Administrative Review:

- Blueberry mini waffles
- Apple frudel
- Goldfish crackers

The Public Health Nutritionist also provided a Product Formulation Statement to the Food Service Director for one of the two mock chicken leg products served for lunch on the day of review.

All schools participating in USDA Child Nutrition Programs are required to have completed production records, documentation (Child Nutrition labels, Product Formulation Statements, USDA Foods Product Information Sheets), and standardized recipes readily available onsite in order to demonstrate that compliant meals were and are served to students.

Weight versus Volume

As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). The fact that spoodles, which are used to measure volume, are often referred to as a “4 oz spoodle” for example, makes this somewhat confusing. A 4 ounce (oz) or ½ cup spoodle is actually 4 fluid ounces (fl oz) rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly.

Meat/meat alternate and grain are credited by weight, not by fluid ounces. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving of meat/meat alternate or grain. To ensure that students are receiving the adequate amount of meat/meat alternate or grain, weigh the meat/meat alternate or grain, then determine which scoop will hold that weight.

In-House Yield Study

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. An in-house yield study may be warranted if your food service operation consistently gets higher or lower yields from a product than what is specified in the Food Buying Guide (FBG). Additionally, an in-house yield study may be used for food items or sizes that are not currently listed in the FBG (e.g. 175 count apples). [In-house Yield Study Procedures](#) are available on the [Menu Planning](#) website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

Milk Recipe

If it becomes too time- or labor-intensive to record milk usage by type on production records, you may consider using a [Milk Recipe](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc>). A milk recipe is documentation of average milk usage by meal (breakfast or lunch) and grade group. When a milk recipe is on file, total milk usage must still be recorded on production records. Milk recipes must be updated twice per year or when you notice that students’ preferences have changed.

Findings and Corrective Action Needed for Meal Pattern and Nutritional Quality:

Finding #1: Crediting documentation was not provided for the following menu items during the week of review:

- Bite-sized chicken breast chunk fritters served as part of the orange chicken recipe on Monday
- Cheese omelet offered on Tuesday
- 45 gram Cinnamon Toast Crunch cereal bar on Monday

Crediting documentation for the mock chicken leg offered at lunch on the day of lunch observation was unavailable onsite. Please see **Finding #3** for more information about the mock chicken leg on the day of review.

Corrective Action Needed: Submit valid crediting documentation for the bite-sized chicken breast chunk fritters, cheese omelet, and 45 gram Cinnamon Toast Crunch cereal bar offered during the week of review and mock chicken leg offered on the day of review.

If unable to obtain crediting documentation, submit a written statement indicating what items crediting documentation was unavailable for. Indicate understanding that if a product does not have a valid CN label, PFS, USDA Foods Product Information Sheet, cannot be found in the USDA Food Buying Guide for School Meal Programs, or cannot be credited using Exhibit A, it may not be credited when served as part of the USDA School Meal Programs.

□ Finding #2: Documentation provided for the week of review lacked standardized recipes for menu items with more than one ingredient. The following menu items served during the week of review require standardized recipes:

- Orange chicken
- Brown rice
- Egg noodles
- Chili with meat and beans
- Salad with tomatoes
- Gravy for meatballs

The standardized recipes listed are needed in order to credit the menu items during the week of review. While some standardized recipes were provided onsite and discussed with the Food Service Director, it is unclear as to whether the recipe is for 50, 100, or 150 portions.

Please use the DPI SNT [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage to aid in the recipe standardization process (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). There is a [Standardized Recipe Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf) that includes all parts of a standardized recipe, calculators to assist with nutrient analysis, and a template to organize the information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf). The recipe standardization process may take several times producing the menu item to make sure it comes out the same way. This requires organized record keeping throughout the process.

Corrective Action Needed: Submit standardized recipes for the orange chicken, brown rice, egg noodles, chili with meat and beans, salad with tomatoes, and gravy served during the week of review.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review listed in Findings #1 and #2, menus can be analyzed for compliance with the School Breakfast Program and National School Lunch Program meal pattern requirements. Until that time, the Administrative Review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

❑ **Finding #3:** On the day of review, a mock chicken leg was planned to be offered for lunch. During morning meal preparation, one brand of a mock chicken leg was prepared. The Food Service Director was unable to provide crediting documentation for this product. The Public Health Nutritionist was able to find crediting documentation, a product formulation statement (PFS), for the specific product on the manufacturer's website. Crediting documentation was provided to the Food Service Director. The mock chicken leg credited as 2.00 ounce equivalent (oz eq) meat/meat alternate (M/MA).

During middle school lunch service, the mock chicken leg that was offered became significantly smaller in size. The Public Health Nutritionist asked the Food Service Director if the school nutrition professionals prepared a different product during observation of the pre-K-5 lunch service. The Food Service Director reported that a different mock chicken leg product was prepared and that there was not crediting documentation available onsite. The Public Health Nutritionist made note of this during meal service.

After lunch service, the Public Health Nutritionist attempted to assist the Food Service Director with obtaining crediting documentation, however, the manufacturer did not have crediting documentation on their website. The Public Health Nutritionist suggested reaching out to the manufacturer directly to see if there is crediting documentation for the second mock chicken leg product that was offered on the day of review.

Without crediting documentation, the mock chicken leg cannot be credited toward the National School Lunch Program meals served on the day of review. The mock chicken leg would not be considered a missing M/MA component because it is evident that M/MA is in this product. However, if crediting documentation is unavailable for the mock chicken leg, it would be considered a M/MA shortage for the day of review since the oz eq of M/MA cannot be determined.

Corrective Action Needed: See *Finding #1* for corrective action required.

If unable to provide crediting documentation for the second mock chicken leg product offered on the day of review, fiscal action will be assessed on the 110 meals where the second mock chicken leg product was offered. According to page 77 of the Administrative Review Manual, meals that contain insufficient quantities are subject to fiscal action for repeated violations. The following repeat violation was documented from the School Year 2016-17 Administrative Review's April review week:

- ***"The lasagna recipe submitted could not be used for crediting, and to complete the nutrient analysis, we subbed in the pizza sticks that were observed on 9/15/17." No other M/MA was offered on this day during the April week of review, therefore, this led to a daily M/MA shortage.***

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

❑ **Finding #4:** Documentation provided for the week of review demonstrated a daily M/MA shortage at lunch for 9-12 students on Tuesday. According to the Child Nutrition label submitted for the meatballs offered, five meatballs provide 2.00 oz eq M/MA. Four meatballs were offered to 9-12 students, crediting as 1.50 oz eq M/MA. The 9-12 daily M/MA requirement is 2.00 oz eq.

Corrective Action Needed: Submit a written statement explaining how the daily 2.00 oz eq M/MA requirement at lunch for the 9-12 students during the week of review will be met and your plan for ensuring the minimum M/MA requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

Additionally, fiscal action is required for any repeat daily M/MA shortage violations from the previous Administrative Review. Therefore, fiscal action will be assessed. Per page 81 of the Administrative Review

Manual, there will be a reclaim of meals with the insufficient M/MA quantity. All 64 meals served to 9-12 students on Tuesday during the week of review will be reclaimed due to an insufficient M/MA quantity offered. Please see Finding #3 for the repeat violation.

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

❑ **Finding #5:** Documentation provided for the week of review demonstrated a daily grain shortage at lunch for the 9-12 students on Thursday. According to the Child Nutrition label submitted for the chicken nuggets offered, four chicken nuggets provide 1.00 oz eq grain. Six chicken nuggets were offered to the 9-12 students, crediting as 1.50 oz eq grain. The 9-12 daily grain requirement is 2.00 oz eq.

Corrective Action Needed: Submit a written statement explaining how the daily 2.00 oz eq grain requirement at lunch for the 9-12 students during the week of review will be met and your plan for ensuring the minimum grain requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

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

❑ **Finding #6:** Documentation provided for the week of review demonstrated a daily fruit shortage at lunch for 9-12 students on Wednesday, leading to a weekly fruit shortage as well. A 163 count apple was offered to students as the fruit component for the day. A 163 count apple credits as $\frac{3}{4}$ cup. The 9-12 daily fruit requirement is 1 cup. Over the course of the week, 9-12 students were offered only $4\frac{3}{4}$ cups of fruit, due to the daily shortage on Wednesday. The 9-12 weekly fruit requirement is 5 cups.

For assistance with identifying crediting of common fruits and vegetables, the DPI SNT [Half-Cup Crediting of Fruits and Vegetables Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) is a great resource (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf).

Corrective Action Needed: Submit a written statement explaining how the daily 1 cup and weekly 5 cups fruit requirement at lunch for the 9-12 students during the week of review will be met and your plan for ensuring the minimum fruit requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

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

❑ **Finding #7:** Documentation provided for the week of review indicated that 100 percent of the grains offered at lunch for the K-8 and 9-12 meal patterns were not whole grain-rich (WGR). It is required that 100 percent of grains offered at breakfast and lunch be WGR. Grains that are not WGR cannot be credited toward daily or weekly WGR requirements.

The egg noodles offered on Tuesday during the week of review are not WGR. Foods that meet the WGR criteria for the Child Nutrition Programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. USDA has a very thorough [Whole Grain Resource that provides tools and tips for identifying whole grain-rich products](https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf)

(https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

Corrective Action Needed: Submit a written statement indicating how the WGR requirement at lunch for the week of review will be met and your plan for ensuring the requirement is met for future service weeks.

Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable, for the product that will be used instead of the egg noodles that were offered during the week of review.

❑ **Finding #8:** Documentation provided for the week of review demonstrated a daily and weekly fruit shortage at breakfast. A 3.99 ounce applesauce cup was offered on Monday. An applesauce cup must be 4.50 ounces, by weight, in order to credit as $\frac{1}{2}$ cup of fruit. The 3.99 ounce applesauce cup credits as $\frac{3}{8}$ cup fruit. Therefore, a total of $\frac{7}{8}$ cup of fruit was offered on Monday with the applesauce cup and fruit juice. The daily fruit requirement for K-12 breakfast is 1 cup.

Because less than 1 cup of fruit was offered on Monday, and 1 cup of fruit was offered Tuesday-Friday, only $4\frac{7}{8}$ cups of fruit were offered during the week of review. The weekly fruit requirement for K-12 breakfast is 5 cups. Due to this daily and weekly fruit shortage, the weekly 50 percent juice limit was exceeded by 1.28 percent.

Corrective Action Needed: Submit a written statement explaining how the daily 1 cup fruit requirement, weekly 5 cups fruit requirement, and weekly 50 percent juice limit at breakfast during the week of review will be met and your plan for ensuring the minimum fruit requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

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

❑ **Finding #9:** During lunch service on the day of review, the planned fruit was $\frac{1}{2}$ cup or 1 cup strawberries, depending on the age/grade group. Prior to 9-12 lunch service, strawberries ran out. A 138 count orange was substituted. The 138 count orange was offered to 9-12 students. Technical assistance was provided that a 138 count orange credits as $\frac{1}{2}$ cup fruit and the daily requirement for 9-12 students is 1 cup of fruit. Corrective action was completed by offering the students two oranges and allowing them to deny one or both oranges under Offer versus Serve (OVS).

For assistance with identifying crediting of common fruits and vegetables, the DPI SNT [Half-Cup Crediting of Fruits and Vegetables Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) is a great resource (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>).

Corrective Action Needed: *Corrected during meal service, no further action required.*

❑ **Finding #10:** Seven non-reimbursable meals were observed during lunch service on the day of review. Seven 9-12 students did not select the $\frac{1}{2}$ cup fruit, vegetable, or combination requirement under OVS. Under OVS, it is required that students select three full components, one of which is $\frac{1}{2}$ cup fruit, vegetable, or combination. A full component is considered the full daily requirement of a component, such as 2.00 oz eq grain, 2.00 oz eq meat/meat alternate, 1 cup fruit, 1 cup vegetable, or 1 cup milk for 9-12 students specifically.

Corrective Action Needed: Submit a written statement indicating understanding of the OVS $\frac{1}{2}$ cup fruit, vegetable, or combination requirement and detailing how this error will be corrected and avoided in the future.

Fiscal action will be assessed on these seven non-reimbursable meals but not duplicated with fiscal action assessed in Finding #3, if any.

❑ **Finding #11:** Three non-reimbursable meals were observed during breakfast service on the day of review. When the breakfast period ended, the Food Service Director locked the milk cooler. Three students came through the line after the milk cooler was locked and were marked on the check off sheet by another school nutrition professional as having a reimbursable meal. Because these three students did not have access to milk, this is considered a missing milk component.

Corrective Action Needed: Submit a written statement detailing how this error will be corrected and avoided in the future.

Additionally, fiscal action is required for any missing meal components. Fiscal action will be assessed on these three meals.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant address financial topics with the FSD, including 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.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](http://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 (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](#) are located on the DPI 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". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.
- 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” report any time you pay someone for services provides such as equipment repair and health inspections.
- Under “nonprogram foods”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
- When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

Allowable Costs

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

Unpaid Meal Charge Policy

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

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, the revenues and expenses were not broken out into the respective program and expense categories correctly—too much in nonprogram foods.
Corrective Action Needed: Please resubmit your 17-18 Annual Financial Report with revenues and expenses broken out by program and category. This can be done online through December 31st. After that date, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update. Corrected onsite-no further action necessary.

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)/Compliance Reminders

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

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

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

(2017-18 SY) should be used to determine adult prices.

Resources

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

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- ❑ **Finding:** The Nonprogram Foods Revenue Tool has not been completed for the current school year.
Corrective Action Needed: Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool for Early View Academy, using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).
- ❑ **Finding #2:** Nonreimbursable meals are not being tracked and funded.
Corrective Action Needed: Provide a statement explaining how nonreimbursable meal costs (nonprogram foods) will be recovered and paid to the nonprofit school food service account.
- ❑ **Finding #3:** Second milks are offered to students which are not part of the reimbursable meal and are considered nonprogram foods. These milk costs may not be absorbed by the non-profit school food service account. Either the items need to be tracked and charged to the students at nonprogram food prices, or the items need to be tracked and a transfer of funds, at nonprogram food prices, must be made from non-federal sources into the food service account for the full cost of items offered.
Corrective Action Needed: Please submit a plan defining how these nonprogram second milk costs will be covered by Early View Academy of Excellence for the 18-19 school year.

Indirect Costs

Comments/Technical Assistance (TA)/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local reality broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.

- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance (TA)/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 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 or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must 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 Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- 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, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional

requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

- Finding #1:** An outdated And Justice for All poster is posted in cafeteria.
Corrective Action Required: Remove incorrect And Justice for All poster and replace with correct version. Corrected onsite, no further action necessary.
- Finding #2:** Annual Civil rights training is required for all individuals who administer any portion of Child Nutrition Programs.
Corrective Action Required: Authorized Representative and alternate POS staff for BIC need to view Civil Rights powerpoint, sign sign-in sheet and submit copy of sheet to reviewer.

Local Wellness Policy

Comments/Technical Assistance (TA)/Compliance Reminders

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

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school

health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Content of the Wellness Policy

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

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

Resources:

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

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding:** SFA LWP meets some but not all requirements as stipulated above.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule.

Smart Snacks

Compliance Reminders:

At the time of the on-site review there were no competitive foods or beverages sold at Early View Academy of Excellence. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales.

A la Carte

Daily a la carte options at Early View Academy of Excellence are options that are part of the reimbursable meal. The a la carte options sold are part of the reimbursable meal the day they are sold and are exempt from Smart Snacks general and nutrient standards. Please see the Non-Program Foods section for more information about these a la carte options.

Final Rule

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

Fundraisers

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

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; SFAs have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Findings and Corrective Action Needed for Smart Snacks:

There were no findings and therefore no corrective action is needed.

Professional Standards

Comments/Technical Assistance (TA)/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 the 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: New Food Service Director Hiring Requirements

SFA Enrollment under 500	SFA Enrollment under 2,499	SFA Enrollment 2,500 – 9,999	SFA Enrollment > 10,000
*High school diploma (or GED) and at least 1 year relevant experience in school nutrition	*High school diploma (or GED) and at least 3 years relevant experience in school nutrition	*Associate degree (or equivalent) with related academic major and at least 2 years of relevant experience in school nutrition	*Bachelor’s degree (or equivalent) in any academic major and at least 5 years experience in school nutrition
In addition, new directors are required to obtain at least 8 hours of food safety training, either not more than 5 years prior to their starting date or completed within 30 days of their start date.			
*Note: These are minimum standards. Reference USDA’s summary of the Professional Standards Final Rule for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/profstandards_flyer.pdf).			

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](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:** Required training hours for FSD on tracker are not correct.
Corrective Action Needed: Correct required training hours for FSD on DPI tracking tool and submit corrected tool as part of corrective action.

Water

Comments/Technical Assistance (TA)/Compliance Reminders

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.

For more information and resources on the water requirement, see our [Water Availability webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/water-availability) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/water-availability).

Food Safety and Storage

Comments/Technical Assistance (TA)/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site’s Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the “And Justice For All” poster can be a convenient way to have both items publicly visible.

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Food Safety Plans

- The Food Safety Plan was available for review. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (https://dpi.wi.gov/school-nutrition/food-safety)

- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- **The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times. Cases of food were observed stacked on the floor and items out of original container or open were not date-marked.**
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. **This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.**
- **It is a best practice to regularly review SOPs with staff, such as at monthly meetings.**

Food Employee Reporting Agreements

- **All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).**
- **Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.**

Storage

- **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)). It was observed that secondary storage areas are not secured or separated from groups that may use secondary kitchen and storage areas for various school functions.**
- **The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. Cases of food were observed stacked on the floor.**

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.

- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Missing Food Employee Reporting Agreements
Corrective Action Needed: Missing 1 employee reporting agreement. Submit copy of completed agreement as an attachment to assigned DPI Nutrition Program Consultant via email. Corrected onsite. No further action required.
- ❑ **Finding #1:** Standard operating procedures (SOPs) in food safety plan are not being followed.
Corrective Action Needed: Please provide a statement indicating understanding of importance of Food Safety Manual and its use. Please review SOP for storage of food and SOP for marking food items in storage, have employees initial/date and send copy of signed SOPs to reviewer.
- ❑ **Finding #3:** Secondary storage area not secured against theft of purchased foods/supplies.
Corrective Action Needed: Please provide a plan for how program food and supplies stored in secondary storage area will be safeguarded against unwarranted use and theft.

Buy American

Compliance Reminders:

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

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

Technical Assistance:

Non-Compliant Products Found Onsite

The following products identified in Early View Academy of Excellence's storage did not have proper labeling to identify the country of origin:

- Brown sugar- packed in the USA
- Cinnamon- distributed Dierks Waukesha
- Juice- Akron, OH
- Baked beans- Bush Brothers and Company

- Spaghetti sauce- packed by Hirzel
- Omelets- distributed Michael Foods, Inc.
- Pulled chicken- Brakebush Brothers, Inc.
- Mini waffles- distributed General Mills
- Cherry tomatoes- Maglio and Company

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

Achieving Buy American Compliance

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, “We certify that (insert product name) was processed in the U.S. and contains over 51 percent of its agricultural food component, by weight or volume, from the U.S.” This can be accepted in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (https://dpi.wi.gov/school-nutrition/procurement/procurement-manual). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed for Buy American:

❑ **Finding #1:** The following food items were identified in Early View Academy of Excellence’s storage area as non-domestic:

- Frozen California blend- product of Mexico
- Trio Brown Gravy Mix- product of Canada
- Canned pineapple- product of the Philippines
- Mixed and tropical Dole fruit cups- product of Thailand

Early View Academy of Excellence does not have Buy American – Non-compliant Lists or SFA equivalent form for these product.

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

Reporting and Recordkeeping

Comments/Technical Assistance (TA)/Compliance Reminders

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

Findings and Corrective Action: Reporting and Recordkeeping

- Finding:** Records are not kept on file for the minimum timeframe.
Corrective Action Required: Provide a Statement of how records will be maintained as required.

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

Comments/Technical Assistance (TA)/Compliance Reminders

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

Breakfast Promotion

The breakfast participation at the Early View Academy of Excellence is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](#) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

A [Breakfast in the Classroom Toolkit](#) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

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](#) 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.

Summer Meals

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 Early View Academy of Excellence USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

Resources:

- 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

Findings and Corrective Action: SBP and SFSP Outreach

- ❑ **Finding #1:** School Breakfast and Summer Food Service Outreach is not occurring as required.
Corrective Action Needed: Please provide a statement indicating how Early View Academy will become compliant with this regulation.

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snacks

Comments/Technical Assistance/Compliance Reminders

- Each site participating in the Afterschool Snack Program needs to have an onsite monitoring review completed within the first four weeks of operation, and a second review within the school year. The

review form to complete may be found on our [Afterschool Snack Program](http://dpi.wi.gov/school-nutrition/after-school) webpage (<http://dpi.wi.gov/school-nutrition/after-school>).

- Area Eligible Afterschool Snacks are all claimed at the free rate.
- Each afterschool snack location is required to maintain documentation supporting that reimbursable meals were provided to students, including production records with snack items and serving size. Menus are not required, but encouraged. Production record examples are found on the afterschool snack program webpage linked above.
- Participating students are claimed by eligibility category (free, reduced, or paid) when a reimbursable snack is selected.
- Afterschool sites must provide educational or enrichment activities in an organized, structured, and supervised environment.
- [Snack Count Sheets](#) and [production record templates](#) are located on the Afterschool Snack webpage (<http://dpi.wi.gov/school-nutrition/after-school>).

Findings and Corrective Action Needed

- ❑ **Finding #1:** Online contract indicates participation in this program, incorrectly.
Corrective Action Required: Please correct the online contract to indicate the correct program participation. Provide reviewer with screenshot of updated programs from contract.

Fresh Fruit and Vegetable Program

Commendations:

Thank you to the Food Service Director for submitting all requested documentation in an organized and timely manner. Invoices provided for the September claim matched perfectly. The claim validation did not result in any findings or corrective action.

During on-site observation, the Food Service Director gave an excellent nutrition lesson on rainbow carrots, describing the benefits of the different colors. The Food Service Director provides a nutrition lesson to each classroom with their snack.

Findings and Corrective Action Needed for Fresh Fruit and Vegetable Program:

- ❑ **Finding #1:** During observation, ranch dressing was offered with the FFVP snack. The ranch dressing contains 23 grams of fat per 1.5 oz portion cup. It is required that dips served in the FFVP are low-fat or fat-free. Dips also must be a portion size no greater than 1-2 tablespoons. This dip is the same dip that has been served with FFVP snack September-December 2018.

Corrective Action Needed: Submit a written statement indicating understanding that only low-fat or fat-free dips can be offered with uncooked vegetables for FFVP and the dip portion size cannot exceed 2 tablespoons.

If a new type of ranch or other dip was served after the Administrative Review and plans to be claimed for reimbursement, please submit a copy of the nutrition facts label to the FFVP Coordinator after submitting the January claim. This will be outside of the Administrative Review process and will take place before the January or later claim with the new dip is paid.

Fiscal action will be assessed on the full fat ranch claimed in September and October 2018. A total of \$133.98 was claimed in September (\$93.04) and October (\$40.94).

6. COMMUNITY ELIGIBILITY PROVISION (CEP)

Comments/Technical Assistance (TA)/Compliance Reminders

- It is necessary to maintain all certification documents supporting participation in CEP. REMINDER: the current identified student percentage (ISP) and claiming percentages are approved through the 2020-2021 school year, for a four year cycle. CEP participating schools will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).
- [USDA Community Eligibility Provision guidance](http://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) has been expanded in memo SP 54-2016 (www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) to allow for the use of one form for both meal eligibility and as an alternative household form to be used in CEP schools. This may alleviate confusion among households and administrative staff at a mixed district. This memo clearly outlines the requirement to cost-allocate expenses back to the district for processing and distributing forms in CEP schools. CEP applications and labor hours involved with processing them cannot be paid for from the nonprofit school food service account.
- There must also be a method to accurately distinguish between forms from students in CEP versus non-CEP households. CEP applications are not subject to verification, independent review of applications, and the certification and benefit issuance portion of the AR review, nor do these students carry individual meal eligibilities that can extend benefit to other students.

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 student success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!