

## USDA Child Nutrition Programs Administrative Review Summary Report

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**School Food Authority:** Bayfield School District

**Agency Code:** 40315

**School(s) Reviewed:** Bayfield Middle School

**Review Date(s):** 5/1/18-5/3/18

**Date of Exit Conference:** 5/3/18

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

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

### **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](#) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options

(<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

### **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Bayfield School District for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

### **COMMUNITY ELIGIBILITY PROVISION (CEP)**

#### **Commendations/Comments/Technical Assistance/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 2017-2018 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). SFA must renew their CEP contract for the 2018-2019 school year.

### **REVIEW AREAS**

#### **1. MEAL ACCESS AND REIMBURSEMENT**

##### **Certification and Benefit Issuance**

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

- Bayfield School District operates under the Community Eligibility Provision (CEP), providing free breakfast and lunch to all students district wide.
- Appropriate time frames were used to run Direct certification.
- All SFAs are required to distribute a public release before the start of the school year. For CEP schools please use the modified [CEP public release](#). 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 Employment Office

❑ **Meal Access Finding #1:** SFA only sent out the public release to the local newspaper.

**Meal Access Corrective Action Needed #1:** Please submit a statement of understanding that the Public Release must be sent out to the local news media in addition to grassroots organizations, local employment offices and major employers contemplating or experiencing large layoffs.

### **Verification**

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

- Verification Collection Report was completed by February 1.

### **Meal Counting and Claiming**

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

- The meal counts and claims for the Review Month were completed correctly.

#### **Comments**

- Bayfield School District oversees La Pointe School, which is on an island. The SFA is currently providing cold breakfast, snacks for the afterschool snack program and milk for the WI school day milk program. Due to the school being on an island, transporting hot meals daily became an issue, especially if the ice road was not available or the ferry was not operating. For the 2017-2018 school year, the SFA requested bids to have vended meals for La Pointe. The bids contained incorrect specifications for USDA's lunch meal pattern. The State Agency expressed concern for whether the foods planned, offered, and served were creditable based on the USDA Food Buying Guide for Child Nutrition Programs or other supporting documentation, such as Child Nutrition (CN) labels and manufacturer's product formulation statements.
- Bayfield School District pays approximately \$7 per meal per student at La Pointe School related to the complexity of the school's location. Due to the high cost of the meals, the SFA has transferred a large amount of funding into the non-profit food service account. The SFA was encouraged to complete a cost benefit analysis. SFA weighed the cost of sending meals to LaPointe from the central kitchen against vending the meals. Vending the meals is twice as expensive as the SFA transferring the meals to the island.
- For the SY 2018-19, there has been discussion about Bayfield Central Kitchen providing all of the meals to La Pointe. If the SFA decides to provide meals for the upcoming school year, a contingency plan must be put into place. Due to the weather and the ice road being available, meals must be provided to these students, even if transportation is unavailable. SFA will need to create a back-up plan to ensure students can receive a school lunch.

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

### **Commendations and Appreciations**

Sincere thanks to the Food Service Director and school nutrition professionals of Bayfield School District. We appreciate your time and efforts spent preparing for and participating in

the onsite review. In a clean, bright, and welcoming cafeteria, school nutrition professionals offered colorful and nutritious meals. There was a lovely salad bar, featuring local ingredients when seasonally available and labeling to aid students with selecting the appropriate number of pieces of vegetables for ½ cup servings. Thank you to all school nutrition professionals, especially the Food Service Director, for your receptiveness to feedback, both positive and constructive criticism.

## **Technical Assistance and Program Requirement Reminders**

### **Non-Reimbursable Meals**

Eight students at Bayfield Middle School selected non-reimbursable meals during lunch meal observation on May 1. Students left the point of service (POS) with insufficient fruits and/or vegetables to meet the 1/2 cup requirement, while others selected only two full components. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

### **Offer versus Serve (OVS)**

Three food components are required for adequate, nutritious meals for students and to warrant federal reimbursements. Within each component, different food items may be offered, giving students many combinations for building a reimbursable meal. Other than selecting the required minimum 1/2 cup fruit, vegetable, or combination serving, it is the student's choice to select or decline a food component. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) is available on the SNT website (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf).

If only three components are selected, and two of these are fruit and vegetable, the student may only select the 1/2 cup portion for the fruit OR vegetable. For the other two components, the student must select at least the daily minimum required serving of the components for them to be counted.

### **Extra Foods**

Extra foods, such as green chili beef and bean burritos textured vegetable protein (TVP) added, are offered on the menu. Extra foods may credit towards the daily and weekly meal pattern requirements but currently do not have sufficient crediting documentation (e.g. Child Nutrition [CN] label, product formulation statement [PFS]) to support meal pattern contributions. While offering extra items occasionally is allowable and can be an incentive for program participation, staying within the dietary specifications (e.g. calories, sodium, saturated fat, and trans fat) can be very difficult when entrees are offered as extra foods. These foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal.

Peanut butter is often available to students on the meal service line with sliced bread. There is no planned portion size for peanut butter listed on production records or communicated to students. The menu planner does not intend to credit peanut butter as a meat/meat alternate towards daily and weekly minimum requirements, but it does contribute towards the dietary specifications. It is not recommended to leave this item unmonitored for self-service, as peanut butter can be a significant source of calories and saturated fat.

## **Whole Grain-Rich Requirement**

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. The following grain products are not WGR: Sugar Frosted Flakes (Hospitality), Crispy Rice (Hospitality), Special K (Kellogg's), and Classic Wheat Split Fork English Muffins (Baker Source). USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

The terms "wheat" or "made with whole grains" on a product label do not necessarily mean that a product is WGR. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole. Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients.

Grains that do not meet the criteria to be considered whole grain-rich (WGR) cannot be credited towards daily or weekly whole grain-rich requirements. If the SFA can demonstrate a hardship in procuring, preparing, or serving a compliant WGR product that is accepted by students, an exemption can be requested for that specific product. Review the August 23, 2017 memo, "[School Meal Flexibilities for School Year \(SY\) 2017-18](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf)" for more information on the exemption process (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf>). Note that until an exemption approval has been received, WGR products must be served.

## **Portion Control**

Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e. the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches children good eating habits by demonstrating and providing appropriate portion sizes of each food group at a meal. Proper portion control also ensures a reimbursable meal is served, so students receive the planned quantity of the food component (e.g. two ounce equivalents [oz eq] of grain) or nutrients. Food costs are controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase.

Proper portion size utensils should be used. Scoops and spoodles are used to serve fruit, mashed potatoes, rice, and more. They measure different serving sizes and are numbered to differentiate the sizes, such as #8 (1/2 cup), #16 (1/4 cup), etc. The handles are often color-coded; ask the manufacturer for a reference to help correctly identify each scoop size. Slotted, pierced, or perforated spoodles are important for serving foods prepared in liquid when you do not want to add the liquid to the portion. If a tool does not measure, it is not a portion size utensil (e.g. tongs, spatulas, spoons).

### **Weight versus Volume**

Use cup volume amounts when recording portion sizes on the production records for fruits and vegetables. Fruit sizes (e.g. case count) should also be recorded. This is the easiest way to ensure the meal pattern requirements are met. Weight and volume may not be used interchangeably for crediting purposes.

### **Standardized recipes**

Standardized recipes are required for all menu items that have more than one ingredient (e.g. coleslaw). A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. Recipes must be updated to reflect current practices and products. Some standardized recipes exist (e.g. meat sauce, bread/breadsticks/buns), but do not accurately reflect what is happening in the kitchen. Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements.

Continue to work towards recipe standardization, and use all resources available to you. Visit our [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional information (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) or [contact a Public Health Nutritionist](https://dpi.wi.gov/school-nutrition/directory) for assistance (https://dpi.wi.gov/school-nutrition/directory). We encourage viewing [the webcast, What's the Yield with Standardized Recipes?](http://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (http://dpi.wi.gov/school-nutrition/training/webcasts#sr).

### **Food Buying Guide**

The [USDA Food Buying Guide for School Meal Programs](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods), including whole fruits like oranges, apples, bananas, and kiwis. Foods that do not have standards of identity are not listed in the Food Buying Guide and require further documentation (a CN label or a PFS) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs. Refer to the Food Buying Guide for more details on how specific foods and ingredients credit toward the meal pattern (https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs). The [Food Buying Guide Mobile App](https://www.fns.usda.gov/tn/food-buying-guide-mobile-app) provides quick access to food yield information to help you make quick purchasing decisions from your mobile device (https://www.fns.usda.gov/tn/food-buying-guide-mobile-app).

A recent webinar presented by USDA Child Nutrition Programs Nutrition & Technical Assistance Branch showcased the new Food Buying Guide (FBG) Mobile App and FBG Interactive Web Tool via a demonstration. Learn how to utilize the innovative features of these tools including search and navigation, the ability to compare food yield information, and the ability to create a favorite foods list. Access the [recorded webinar](https://youtu.be/UP_t3D7AYAM) (https://youtu.be/UP\_t3D7AYAM) on the [Food Buying Guide Goes Digital! webpage](https://www.fns.usda.gov/tn/food-buying-guide-goes-digital) of the USDA Food and Nutrition Service website (https://www.fns.usda.gov/tn/food-buying-guide-goes-digital).

### **In-House Yield**

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed

during the school food authority's next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG. [Specific and verifiable procedures](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf>), which must be followed, are available on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

### **Production Records**

The breakfast production record template currently in use is missing the following required information: serving site (filled in, but not reflective of serving site); age/grade groupings (K-8 and 9-12 combined; K-12 USDA meal pattern not followed); recipe name/reference number or product name/description; planned number of portions; total number of portions prepared; milk types available and actual usage by type; and planned portion size and actual usage for condiments.

While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements ("Must Haves and Nice to Haves" list) can also be found at that link.

A variety of milk, at least two allowable milk types, is required to be offered daily at lunch and breakfast. Allowable milk types in Child Nutrition Programs include nonfat (skim) unflavored milk, nonfat (skim) flavored milk (e.g. chocolate), and low-fat (1%) unflavored milk. Milk types available and actual usage by type (or milk recipe) must be recorded on production records.

### **Recipes Breakfast Items**

If it becomes too time- or labor-intensive to record breakfast item (e.g. cereal, juice, muffin, etc.) usage by type on production records, consider using recipes. Individual recipes document average breakfast item usage by meal and grade group. When a breakfast item recipe is on file, total usage must still be recorded on production records. Recipes must be updated twice per year or when students' preferences change.

### **Training Recommendation**

Anyone involved with the USDA Child Nutrition Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times during the school year. Classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel and meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training webpage](https://dpi.wi.gov/school-nutrition/training#up) (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast webpage](https://dpi.wi.gov/school-nutrition/training/webcasts) (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

### **Corrective Action**

**Meal Pattern Finding #1:** The daily and weekly minimum requirements for fruit were not met for lunch during the review period as a result of 3/8 cup of fruit offered to students on Friday,

March 9. The daily minimum requirement is 1/2 cup, and the weekly minimum requirement is 2 ½ cups; 2 3/8 cups were offered during the review period. According to the USDA *Food Buying Guide*, one clementine credits as 3/8 cup of whole, peeled fruit. **Insufficient daily quantity of fruit is a repeat finding subject to fiscal action.** *Repeat findings of insufficient weekly quantity of fruit during subsequent Administrative Reviews will be subject to fiscal action.*

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

**Meal Pattern Finding #2:** Eight students at Bayfield Middle School selected non-reimbursable meals during lunch meal observation on May 1. Students left the point of service (POS) with insufficient fruits and/or vegetables to meet the 1/2 cup requirement, while others selected only two full components. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

**Required Corrective Action:** Submit two to three sentences describing how selection of non-reimbursable meals will be corrected and avoided in the future.

**Meal Pattern Finding #3:** Milk is a required component as part of the National School Lunch Program and School Breakfast Program. You must record daily milk varieties and milk usage by type on production records. Milk varieties and milk usage by type was not documented on either the breakfast or the lunch production records submitted for the review period.

**Required Corrective Action:** Please refer to the Required Corrective Action under Meal Pattern Finding #.

**Meal Pattern Finding #4:** Current breakfast production records do not include all required information.

**Required Corrective Action:** Update breakfast production records to include the following missing information: serving site (filled in, but not reflective of serving site); age/grade groupings (K-8 and 9-12 combined; K-12 USDA meal pattern not followed); recipe name/reference number or product name/description; planned number of portions; total number of portions prepared; milk types available and actual usage by type; and planned portion size and actual usage for condiments. **Please submit three full days of completed production records, updated to reflect these requirements.**

**Meal Pattern Finding #5:** Sugar Frosted Flakes (Hospitality), Crispy Rice (Hospitality), Special K (Kellogg's), and Classic Wheat Split Fork English Muffins (Baker Source) are not whole grain-rich products.

**Required Corrective Action:** Discontinue serving these items. Submit crediting documentation (e.g. Child Nutrition [CN] label, product formulation statement [PFS], or complete nutrition facts label with ingredient statement) as applicable.

**Meal Pattern Finding #6:** Recipes for meat sauce and bread/breadsticks/buns are not standardized to the operation. A recipe for coleslaw was not submitted nor provided onsite.

**Required Corrective Action:** Submit standardized recipes for these five menu items, including serving size for single portion(s), total number of portions, and total volume or measure.

**Meal Pattern Finding #7:** Unacceptable crediting documentation for Hormel Fast 'n Easy Fully Cooked Turkey Sausage Patties (56613) and SilverBrook 3/5" Round Egg Patties.



**Required Corrective Action:** Please contact the manufacturers to obtain updated product formulation statements (PFS) for these item, then submit. If proper documentation cannot be obtained, discontinue using these product for school meals and submit crediting documentation for replacement products.

### **3. RESOURCE MANAGEMENT (RM)**

#### **Nonprofit School Food Service Account**

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

##### **Annual Financial Report (AFR)**

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended.
- The 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.
- 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 “Ala Carte”, 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 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 a food expenditure.

#### **Revenue from Nonprogram Foods**

##### **Commendations/Comments/Technical Assistance/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.

- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.

#### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

- RM Finding #1:** Labor was not broken out for all programs, including afterschool snacks and WSDMP.

**RM Corrective Action Needed #1:** Please submit a statement that the SFA will break out all program labor costs for the 2017-2018 Annual Financial Report.

#### **4. GENERAL PROGRAM COMPLIANCE (GPC)**

##### **Civil Rights**

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

- “And Justice for All” posters are posted in public view where the program is offered.
- The civil rights training was completed by all staff in the schools and documentation was available for review.
- The [Civil Rights Self-Evaluation Compliance](#) form was completed and on file by October 31.

##### **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. 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>).

##### **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.

- GPC Finding #1:** SFA did not have the current non-discrimination statement on the menus.

**GPC Corrective Action Needed #1:** Please submit a copy of the menu with the proper non-discrimination statement on it: “**This institution is an equal opportunity provider.**”

## On-site Monitoring

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

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on our [Community Eligibility Provision \(CEP\)](#) webpage, under the resources for currently participating sites section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

### Findings and Corrective Action Needed: Onsite Monitoring

- GPC Finding #2:** On-site monitoring was not completed for the school year for both lunch and breakfast.

**GPC Corrective Action Required #2:** Please complete the CEP on-site monitoring form for lunch at both the central kitchen and La Pointe school. Also, complete the breakfast on-site monitoring form for one of the schools. Submit the completed on-site monitoring forms back to the consultant.

## Local Wellness Policy

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

- SFA had a wellness policy on file and it met all of the minimum requirements. The committee actively meets about 6 times per year to ensure the wellness of their students. Great Job!

### Resources:

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

## Smart Snacks

## **Coffee Sales**

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

### **Beverage Guidelines:**

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

To help determine if coffee drinks are compliant, utilize the Alliance for a Healthier Generation's Smart Snacks Product Calculator (<https://foodplanner.healthiergeneration.org/calculator/>). If they are, you will be able to print a reference sheet showing compliance directly from the website as record keeping documentation.

## **Vending**

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

Powerade Zero and Vitamin Water Zero sold in beverage vending machines are non-compliant with Smart Snacks beverage standards for students in grades K-8. Vitamin Water is non-compliant with Smart Snacks beverage standards for all students, including high school students.

## **Exempt Fundraisers**

The Wisconsin Department of Public Instruction (DPI) 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 webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

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; school food authorities (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.

A vending machine may sell non-compliant foods or beverages in which the profits go to multiple student organizations. You must keep documentation showing that different student organizations receive the funding from this fundraiser for no more than two consecutive weeks at a time, no more than twice per school year. This fundraiser cannot occur in the meal service area during meal times.

However, this type of ongoing unhealthy food and beverage fundraiser within schools is discouraged, as it does not align with the intentions of Smart Snacks standards and the Healthy Hunger-Free Kids Act. Constant unhealthy food and/or beverage fundraisers undermine progress made as a school nutrition department, and district, to provide healthy, balanced meals to students. Whenever possible, the district is strongly encouraged to help student organizations find ways to fundraise that promote a healthy lifestyle. View the Fundraiser Resources on the Smart Snacks webpage, like [Healthy Fundraising Ideas](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/healthy-fundraising-ideas-flyer.pdf) from the School Nutrition Team (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/healthy-fundraising-ideas-flyer.pdf>).

**GPC Finding #3:** Powerade Zero, Vitamin Water Zero, and Vitamin Water sold in beverage vending machines are non-compliant with Smart Snacks beverage standards, as described above.

**GPC Required Corrective Action #3:** Submit a statement describing specific actions which will bring beverage vending machines into compliance. Consider replacing non-compliant products or locking specific machine rows. Sales of non-compliant beverages may not begin until 30 minutes after the end of the instructional school day.

### **Professional Standards**

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

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of 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: 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 Needed: Professional Standards

- ❑ **GPC Finding #4:** Training is not being monitored on a tracking tool.

**GPC Corrective Action Needed #4:** Include all current training hours for each food service employee & other school nutrition staff onto the DPI tracking tool and submit as part of corrective action.

- ❑ **GPC Finding #5:** Staff have not completed the required training hours for the current school year, including the part time staff, which includes those who work with NSLP less than 20 hours per week.

**GPC Corrective Action Needed #5:** Provide a training plan or timeline for meeting the required training hours for staff.

## Water

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

- Water was available for all students in the cafeteria.

## Food Safety and Buy American

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

#### 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.

#### 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.
- 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.

### Findings and Corrective Action Needed: Food Safety and Buy American

**GPC Finding # 6:** Food safety plan was on site, but not filled in or updated annually.

**GPC Corrective Action Needed #6:** Review entire food safety plan and update as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review Page as an attachment to assigned DPI Nutrition Program Consultant via email.

**GPC Finding #7:** During meal service, students could take slices of bread. Students were using their hands to take the bread and one student took a couple of pieces, then put one back. Serving utensils were not provided for the bread.

**GPC Corrective Action Needed #7:** Food must be served with the proper serving utensils, which should align with the SFA's Food Safety Plan SOPs. The consultant mentioned the issue to the food service staff and tongs were immediately put out for the bread. **Corrected on site, no further action required.**

## **BUY AMERICAN**

## **Buy American**

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

1. Date
2. Name of product
3. Country of origin
4. Reason
  - a. Cost analysis
  - b. Seasonality- record the months that the domestic product is not available
  - c. Availability
  - d. Substitution- record the reason the distributor substituted the product
  - e. Distribution- record the reason the distributor carries the non-domestic product
  - f. Other- explain

You may record additional information if you find it beneficial.

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

**GPC Finding #8:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Canned mandarin oranges from China
- Canned mushrooms from Spain
- Canned tuna from Thailand
- Garlic powder from China
- Fresh cucumbers from Mexico
- Fresh green onions from Mexico
- Fresh bell peppers from Mexico
- Fresh pears from Chile
- Fresh cantaloupe from Costa Rica
- Fresh bananas from Guatemala

**GPC Required Corrective Action #8:** Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products.

## **Reporting and Recordkeeping**

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

- Thank you for keeping all records on file for the recommended time frame.
- 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.



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

### **Commendations/Comments/Technical Assistance/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**

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

### **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 Bayfield School District, 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](mailto:amy.kolano@dpi.wi.gov)

## **Findings and Corrective Action: SBP and SFSP Outreach**

- GPC Finding #9:** SFA was not promoting the SFSP outreach programs nearby.

**GPC Corrective Action Needed #9:** Please submit a statement on how the SFA will go about promoting the SFSP programs nearby.

## 5. OTHER FEDERAL PROGRAMS REVIEWS

### Afterschool Snacks

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

- SFA was area eligible for Afterschool Snacks.
- Students were provided a wide variety of options for snacks.
- 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>).

#### Findings and Corrective Action Needed

- ❑ **Other Finding #1:** A student was operating the POS system. It is discouraged to have students operating the POS system since they have access to students' accounts and balances. Anyone working the POS system, must be trained in civil rights and the POS.

**Other Corrective Action Required #1:** Submit a statement on how the SFA will address this issue.

- ❑ **Other Finding #2:** On site monitoring was not completed for this program.

**Other Corrective Action Required #2:** Submit an action plan as to how the SFA will conduct Afterschool Snack monitoring for the 2018-2019 SY.

- ❑ **Other Finding #3:** SFA was not using proper production records to keep track of the food produced and provided to the students.

**Other Corrective Action Required #3:** Please submit a sample of one completed production record for the After School Snack program and a statement as to how the SFA will document the snacks for the following school year.

- ❑ **Other Finding #4 :** It was observed on site that students were taking between two and five snacks. Students in 6<sup>th</sup> grade and younger are only allowed to have two full components. If the menu planner designates more two components for high school students, that is okay

**Other Corrective Action Required #4:** Submit a statement describing how the SFA will handle this situation.

### Fresh Fruit and Vegetable Program (FFVP)

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

- FFVP was offered at the middle school. However, the SFA spent all of their FFVP funds, so the program was not observed. SFA provides FFVP to students every school day. Students have been introduced to a wide variety of fresh fruits and vegetables throughout the entire year. Great job!

## Nutrition Education and Promotion

While not required every time FFVP snack is served, teachers are encouraged to provide nutrition education to students regarding their snack, especially on days when the fruit or vegetable is unfamiliar to most students. Check out 78 new fruit and vegetable fact sheets created by the School Nutrition Team and posted on our [FFVP Promotion](https://dpi.wi.gov/school-nutrition/ffvp/promotion) webpage (<https://dpi.wi.gov/school-nutrition/ffvp/promotion>)!

## Wisconsin School Day Milk Program (WSDMP)

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

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5<sup>th</sup> grade.
- Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one.

### Findings and Corrective Action: Wisconsin School Day Milk Program

- ❑ **Other Finding #5:** The milk served to students for the WSDMP is not from milk produced in Wisconsin. It is from Minnesota. Refer to question 12 of the [WSDMP FAQ](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf>). All or part of the raw milk used by the milk processor must be produced in Wisconsin. The goal of this program is to support Wisconsin dairy farmers.

**Other Corrective Action #5:** Contact your milk vendor to get a statement as to whether a percentage of the raw milk used is from WI. Submit a copy of that statement. Otherwise, submit a statement of how you will make sure all or part of the milk served within the WSDMP is from raw milk produced in Wisconsin.

- ❑ **Other Finding #6:** The WSDMP had a discrepancy in the average weighted cost of milk.

**Other Corrective Action #6:** Submit a statement of understanding that the SFA understands how to calculate the weighted average cost of milk. See the [WSDMP-FAQ document](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf), question number 10 for the calculation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf>).

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

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

