

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

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**School Food Authority: DL Hines Preparatory  
Academy of Excellence**

**Review Date(s): May 1-2, 2018**

**Date of Exit Conference: May 2, 2018**

**Agency Code: 408109**

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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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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 DL Hines Preparatory 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 staff 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 of the staff to be in compliance with program regulations. The nutrition staff is concerned for the nutritional well-being of their students and has great relationships and communication with all students and staff.

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## **REVIEW AREAS**

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

#### **Commendations:**

The SFA retained all appropriate CEP documentation onsite. This included information to support the SFAs Identified Student Percentage (ISP), yearly intent forms, and all communications with DPI SNT. Households are correctly informed before the beginning of the school year notifying them that the SFA is CEP and free meals are provided to all students for that school year. Additionally, the claiming percentage matched the SFAs online contract and monthly claims. Really great work!

#### **Technical Assistance:**

- During school year 17-18, the SFA is in its cycle year four for CEP. Therefore, if the SFA wishes to continue as a CEP school, the [CEP Application \(PI-6304\)](https://dpi.wi.gov/sites/default/files/imce/forms/xls/f6304.xlsx) must be completed. This application may be submitted anytime between May 1 and June 30, 2018 (<https://dpi.wi.gov/sites/default/files/imce/forms/xls/f6304.xlsx>).
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## **1. MEAL ACCESS AND REIMBURSEMENT**

### **Benefit Issuance**

As a CEP school claiming 100% of its students as receiving free meals, the SFA is not required to complete the verification process.

#### **Technical Assistance:**

- The SFA had issues running Direct Certification (DC) run on April 1, 2018. This run was important in determining the ISP for the upcoming application for a new CEP four-year cycle, and therefore, the most recent January DC run will be utilized to determine the ISP. The review team does not foresee any issues with the SFA's CEP application process, however, please keep this in mind for the future.
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### **Counting and Claiming**

#### **Commendations:**

No issues were observed with the SFAs claiming process, nor were there issues with the counts observed for the day of review and review period. Point of service (POS) staff consistently checked total counts of each grade throughout service, and edit checks are completely monthly as required.

Additionally, the review team enjoyed observing teachers and staff working together during service in the cafeteria and lunchroom. It is really great to see the support of the breakfast and lunch programs. Nice work!

Findings and Corrective Action Needed: Counting and Claiming

**❑ Finding #1:** One non-reimbursable meals was served at lunch. This student did not have milk on his tray and does not have a medical statement specifying he does not receive milk. Fiscal action will be calculated.

**Corrective Action Needed:** Please submit a statement to the consultant assigned to your review specifying how this issue will be avoided in the future.

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## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Comments/Technical Assistance/Compliance Reminders

#### Training Recommendation

Anyone involved with the United States Department of Agriculture (USDA) School Meal Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times throughout the year. The 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/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training Page](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 Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts).

#### Transport Sheets/Production Records

Production records or transport sheets are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Thorough, accurate records aid both the vendor and the SFA with forecasting, ordering, menu planning, and reducing food waste.

- The vendor should fill in the total number of meal sent, including any extra meals. The SFA should fill in the actual number of meals served (both student and adult, if applicable) after meal service. Accurately recording meal count information is necessary to show that the number of meals sent sufficiently covers the number of students selecting a reimbursable meal on any given day.
- Transport sheets must accurately document the specific menu items, the number of servings prepared, and any leftovers.
- Be specific on transport sheets about the identity, brand, and description of the items served. Instead of "chilled fruit" or "cold cereal", write out the actual fruit served each day. Items such as the chicken patty should include specific product information. There is a wide variation in formulation of the many products served in the child nutrition programs.

- While there is a column for crediting on the template in use, it is not accurately filled out. Consider including the crediting in ounce equivalents for meat/meat alternates and grains, and cups for fruits and vegetables instead of referring to everything as “1 serving.”
- A list of production record requirements (“Must Haves and Nice to Haves”) and sample production record templates can be found 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>).
- Milk is a required component as part of the School Breakfast and National School Lunch Programs. You must record daily usage by milk type on your transport sheets.
- Any substitutions or modifications made to the planned menu for special dietary needs purposes must also be documented on the transport sheets.

The breakfast transport sheets submitted for the week of review showed two days as having a daily fruit shortage, with only ½ cup being served. During the onsite review, the SFA’s copy of the transport sheets were reviewed, showing that the planned serving sizes had been changed to 1 cup of fruit. This was stated to be a practice on days when fruit juice was not planned, so the planned serving size for fruit was increased to 1 cup. The transport sheets submitted for the week of review were not the finalized copies. Continue to work to accurately fill in transport sheet prior to service to ensure all menu items are being planned and served in the amounts necessary to fulfill the meal pattern requirements.

### Standardized Recipes

Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient, including spices, should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. Continue to use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the [Meal Planning](http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>). 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>).

[USDA's What's Cooking? recipes](https://whatscooking.fns.usda.gov/) and recipes from other sources are a great resource to use in child nutrition programs (<https://whatscooking.fns.usda.gov/>). Please note, even though USDA calls these standardized recipes, they are in fact quantity recipes. These recipes will only be standardized once they have been tried, tested, and adapted to your food service operation. Continue to work to update your recipes to reflect the current products and practices used to prepare meals for the SFA, and adjust the crediting accordingly.

### Volume Versus Weight

Meat/meat alternate (M/MA) is 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 ground/diced/shredded meat. Fluid ounces are a volume measure, while ounces are a weight measure. To ensure that students are receiving the adequate amount of meat/meat alternate, weigh the meat/meat alternate, then determine which scoop will hold that weight of meat.

The following table compares weight and volume.

	Measures	Measured In	Tools Used
<b>WEIGHT</b>	Meat/meat alternates Grains	Ounces (oz) Grams (g) Kilograms (kg) Pounds (lb or #)	Scale
<b>VOLUME</b>	Fruits Vegetables Milk	Fluid ounces (fl oz) Tablespoon (T or TBSP) Teaspoon (t or tsp) Cups (c) Pint (pt) Quart (qt) Gallon (gal) Liter (L)	Spoodles, measuring cups, measuring spoons, scoops, dishers, ladles

**\*WEIGHT AND VOLUME ARE NOT EQUAL OR INTERCHANGEABLE... OUNCES ≠ FLUID OUNCES**

For more practice with weight versus volume, watch the, [What's the Scoop with Portion Control](https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story_html5.html) webcast ([https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story_html5.html)).

### Crediting Documentation

Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; 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 (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for School Meal Programs, it may not be credited when served as part of the USDA School Meal Programs. Additionally, remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage ([dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning)).

### Crediting Calculations

Crediting for meat/meat alternate and grain products must always be rounded down to the nearest quarter (0.25) ounce equivalency. For example, the documentation submitted for the hot dog bun served during the week of review states that it credits as 1.94 eq., based on the amount of creditable grains in the product. However, based on the rules for rounding, this bun would actually credit as 1.75 oz. eq. of grain.

Alternatively, grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) of the USDA *Food Buying Guide* (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). Using Exhibit A, the same hot dog bun would credit as 2.0 oz. eq., based on the overall weight. Either method of crediting grain items is acceptable, but note that the amount of ounce equivalents for grains and meat/meat alternates should always appear in increments of quarter ounce equivalents.

### Vegetable Subgroups

Vegetables are categorized into their respective subgroups based on nutrient content, rather than name or color. The menu planning worksheet submitted with documentation for the week of review contained errors in categorizing vegetables into the subgroups.

- Green peas are a starchy vegetable
- Refried beans are in the beans/peas (legumes) subgroup

Technical assistance was given to the vendor and SFA to categorize the planned vegetables into their respective subgroups instead of placing the vegetables served in excess of the weekly minimum into the additional vegetable category. Doing so may serve as a check on the subgroup requirements each week.

The [Vegetable Subgroups Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) shows how many popular vegetables are categorized. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>).

### Menu Offerings

There are many resources available for school nutrition professionals when thinking about menu items to drive meal participation. The School Nutrition Team [Recipe Resources and Tools](#) webpage contains links to recipes from USDA and other school nutrition professionals. Additionally, reaching out to other schools and your product distributors may provide you with insight into popular products and menu items for students. Consider conducting student surveys to determine how your menus could best serve your customers. Please be aware that all recipes and menu items must be suitable for the child nutrition programs. You may contact the [School Nutrition Team staff](#) for guidance on recipes, menus, and meal crediting.

Your printed menu should be an accurate representation of what you plan to serve at both breakfast and lunch. For example, if you do not intend to serve crackers with the cold cereal at breakfast, then they should be removed from the menu. Having a menu that shows students and parents what is included with a reimbursable is a great tool to drive meal participation.

### Breakfast Promotion

It is great to see that the SFA offers the School Breakfast Program. Perhaps a change in the breakfast service model could increase participation. Breakfast in the classroom is associated with the highest participation rates, which can be as high as 98 percent of the school's enrollment, and works best in elementary schools. Other service methods, such as Grab 'n Go and breakfast after first period, correlate with increases as much as 15-40 percent of current participation. If breakfast is offered in a convenient way for students, they will participate in the program. Additionally, greater participation equates to more students being ready to learn, as well as higher levels of government reimbursement, which results in more revenue for the school.

Refer to the [Serving Up a Successful School Breakfast Program](#) guide for an in-depth look at the various School Breakfast service models to determine which one(s) may work in your school. Find additional information on breakfast, including meal pattern and menu planning tools, on the [School Breakfast Program](#) webpage (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>). Please

contact our School Breakfast Specialists Tracy Huffman, MS, RDN, CD at [tracy.huffman@dpi.wi.gov](mailto:tracy.huffman@dpi.wi.gov) and Hannah Snider, MPH, RDN, CD at [hannah.snider@dpi.wi.gov](mailto:hannah.snider@dpi.wi.gov) for additional guidance.

### No Offer Versus Serve

OVS is not required for grade K-8 students, although it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, grade K-8 students must be served all meal components in the planned amounts to create a reimbursable meal. If OVS is implemented, then students can choose three of the five components offered, including ½ cup fruit, vegetable, or combination to create a reimbursable meal. While OVS may appear challenging to implement, it may serve as a way to accommodate dietary preferences and reduce food waste.

### Food Quantities from Vendor

With a vendor, servers must assess the quantity of components halfway through meal service to ensure each student is offered the proper amount of each component. If staff assess a component shortage, immediate corrective action should be taken by either calling the vendor for more of the required component or by having a small stock in-house in case of emergencies. If timing does not allow for delivery of additional food, offering the remaining food but not claiming reimbursement for the meal is an option.

### CACFP Meal Pattern

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

### Sugar in cereal

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. The documentation submitted for the Cocoa Puffs, Trix, Apple Cinnamon Cheerios, Lucky Charms, Fruity Cheerios, and Frosted Corn Flakes bowlpaks show that these cereals are above the sugar limit for the serving size. To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements. For more information, including the sugar limit charts, calculation examples, and cereals that meet the sugar requirements, please refer to the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

### Milk types

Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk may not be served. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. Continue to serve the 4K students unflavored milk as you did on the day of meal observation.

For questions about the updated CACFP meal pattern, please contact our specialists: Tanya Kirtz at [Tanya.Kirtz@dpi.wi.gov](mailto:Tanya.Kirtz@dpi.wi.gov) or Erin Opgenorth at [Erin.Opgenorth@dpi.wi.gov](mailto:Erin.Opgenorth@dpi.wi.gov).

#### Resources

- [Lunch “In a Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf) (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf)
- [Lunch Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf) (dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf)
- [Breakfast Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-mpt.pdf) (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-mpt.pdf)
- [Breakfast “In a Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-in-a-nutshell.pdf) (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-in-a-nutshell.pdf)

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

**Meal Pattern Finding #2:** There was a daily grain shortage at lunch on Thursday of the week of review. The corn tortilla chips served with the Nachos were portioned out so each student received eight chips. Product documentation was provided for two brands of tortilla chips, but the production record did not note which brand was served this day. Eight chips of the Tyson Round Pre-Fried Tortilla Chips would provide 0.5 oz. eq. grain. Eight chips of the Tostitos Crispy Rounds would provide 0.75 oz. eq. grain. Students following the K-8 meal pattern must be served a minimum of 1 oz. eq. of grain daily at lunch. Regardless of which tortilla chip brand was served, this serving size of tortilla chips resulted in a daily grain shortage.

**Corrective Action Needed:** Submit a written statement of how you plan to bring this Nacho meal into compliance to meet the daily grain requirements for K-8 students. Submit updated planned serving sizes and additional product information if applicable.

*Repeat violations of a daily grain shortage during subsequent Administrative Reviews may result in fiscal action.*

**Meal Pattern Finding #3:** The nacho meat served with the Nachos w/ cheese sauce menu item on Thursday of the week of review was served using a 1 ounce ladle instead of portioning this item by weight. Additionally, cooked beef crumbles are being substituted for raw ground beef, without any modifications made to the amounts, procedures, or yield of the recipe. Without a weight or accurate standardized recipe, the crediting of the nacho meat cannot be determined.

The Nacho Cheese Sauce recipe states that a 1 ½ oz. ladle provides 1 oz. eq. meat/meat alternate. However, the cheese sauce is being served with a 1 oz. ladle, which credits as 0.5 oz. eq. meat/meat alternate.

The 1 oz. ladle of cheese sauce alone does not meet the daily minimum meat/meat alternate requirement and does not credit as the amount intended. Once the requested information has been submitted, the meat/meat alternate crediting for this menu item can be determined and the daily and weekly meat/meat alternate requirements can be assessed.

**Corrective Action Needed:** Submit the following:

- The weight (in ounces) of the amount of the nacho meat that the 1 ounce ladle holds.



- An updated standardized recipe for the nacho meat that reflects the products and procedures actually being used, and a corrected yield, if applicable.
- Please include an updated planned serving size for the nacho meat if the re-standardized recipe does not credit as intended.
- A written statement explaining which serving utensil you will use for the Nacho Cheese Sauce going forward, and how you intend for this to credit toward the meat/meat alternate component.

**Meal Pattern Finding #4:** The breakfast and lunch transport sheets submitted for the week of review were missing essential information. Refer to the technical assistance included above.

**Corrective Action Needed:** Submit one week of both breakfast and lunch transport sheets showing accurate and complete information is now being recorded. An example transport sheet was provided, which may be used as a reference.

**Meal Pattern Finding #5:** The standardized recipes submitted for the week of review were not standardized to the production kitchen producing meals for the SFA. Additionally, some recipes contained quantity and crediting errors. Please refer to the above technical assistance and resource links for what needs to be included in a standardized recipe.

**Corrective Action Needed:**

- The Turkey meatball sub requires a standardized recipes since two or more ingredients are used. Submit a completed standardized recipe for this menu item.
- The Turkey Ham and Cheese on a Bun recipe contains quantity errors in the amounts of the ingredients called for. Please also update the product information and nutrition information for the products currently in use. Submit the corrected standardized recipe.
- The Chunky Tomato Soup recipe states two different yields. Submit an updated recipe showing the correct information for both portion yield and total yield. Please also reformat the recipe so the weights and measures of the ingredients are under the correct heading.
- Update the Chicken Patty Sandwich and BBQ Chicken Patty recipes to reflect the products currently being used for these menu items. Please also update the crediting information on both recipes. Submit both recipes showing these changes.

**Meal Pattern Finding #6:** Breakfast and lunch signage posted in the cafeteria contained language that reflected Offer versus Serve (OVS) service, which the school does not utilize.

**Corrective Action Needed:** Submit a photo showing these signs have been modified to eliminate the OVS language.

*Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the 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.*

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

The foodservice director manages the foodservice account very well, unallowable and indirect costs are not being charged, and the SFA has a great internal controls policy. Thank you!

#### **Technical Assistance:**

##### Annual Financial Report

- On the Annual Financial Report (AFR), the ending fund balance **cannot** be in the negative. If it is negative, a “Transfer In” from non-federal funds must be made to cover the deficit.
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#### Revenue from Non-program Foods

#### **Technical Assistance:**

##### Annual Financial Report

- For the SY 16-17 AFR, labor expenditures had not been allocated toward non-program foods. In the future, this portion of the AFR must be complete. For more information, please reference the [Non-program Food Revenue Tool Exceptions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).
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### 4. GENERAL PROGRAM COMPLIANCE

#### Civil Rights

#### **Commendations:**

Thank you for completing the Civil Rights Compliance Self-Evaluation form (PI-1441) by October 31. Additionally, all appropriate staff completed the annual civil rights training. Great work!

#### **Technical Assistance:**

##### Special Dietary Needs

- In the case of creating an Individualized Education Plan (IEP) for a student, DPI SNT encourages communication between households, health coordinators, and the food service director to determine the safest and most appropriate plan for the student.
- If a food allergy is listed on a medical statement, either a parent or medical practitioner needs to specify what the alternative to the allergen may be. To the best of its ability and within reason, the SFA must provide the specified alternative. The parent or guardian has the option to decline the alternative offered by the SFA. Please reference the [Special Dietary Needs Questions and Answers](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/q-and-a-sp-59-2016.pdf) document for additional information on medical statements, including IEPs (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/q-and-a-sp-59-2016.pdf>).
- During lunch service, students who have brought bagged lunch from home are separated from students eating reimbursable meals. This separation is due to food safety concerns and issues surrounding food sharing. It is encouraged the SFA create a new system that integrates all students. A possible solution is to have a designated a “no food allergens” table where students with bagged lunches are not allowed to eat their lunch. It is up to the SFA to decide how it will handle this segregation issue while still keeping food safety in mind.

#### **Compliance Reminders:**

##### Processing complaints

- The SFA has a very expansive and detailed civil right complaint policy. The review team would like to make note that, per new regulations within the [Permanent Agreement](#), when a complaint is submitted to the SFA, the SFA has five days to report the complaint to USDA (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/permanent-agreement.pdf>).

Findings and Corrective Action Needed: Civil Rights

**❑ Finding #7:** The non-discrimination statement is not on the Local Wellness Policy (LWP), Special Dietary Needs medical statement, nor is it on the School Breakfast Program (SBP) outreach document.

**Corrective Action Needed:** Please include the full non-discrimination statement at the end of the LWP and medical statement, and include the shortened non-discrimination statement on the SBP outreach documents. Send the revised copies to the consultant assigned to your review.

**Resources:**

- [Full Non-Discrimination Statement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc>)
- The shortened statement is as follows: **This institution is an equal opportunity provider.**

**Local Wellness Policy**

**Commendations:**

The SFA's LWP displays its dedication to school and community wellness. All required components are included. Wonderful work!

**Smart Snacks in Schools**

**Comments/Technical Assistance/Compliance Reminders:**

The Smart Snacks Final Rule finalized 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](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

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, 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.

Two beverage vending machines owned by the church are located in the SFA's cafeteria. The vending machines were observed to be off during lunch service, but were on later in the school day and the next morning. While no student purchases were observed, as a best practice, post a sign instructing students that purchases are not to be made during the school day if the machines are not able to be turned off each day.

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### **Professional Standards**

#### **Commendations:**

All required trainings are completed for all school nutrition and non-school nutrition employees for this school year. Great work!

#### **Technical Assistance:**

- The Professional Standards training tracker for each foodservice employee contains trainings for multiple school years. It may be beneficial to have a separate tracker for each school year as the tracker automatically calculates the training hours completed to date. This may skew the number of training hours the SFA believes an employee has completed. However, if the SFA feels confident in how it tracks the trainings, no action is required.
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### **Water**

Thank you for having free, potable water accessible to all students without restriction during meal services!

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### **Food Safety and Storage**

#### **Commendations:**

No storage violations were observed onsite, and the food safety plan was site-specific and contained all required employee reporting agreements. Additionally, two food safety inspections have been completed the school year as required. Thank you!

#### **Technical Assistance:**

- During breakfast and lunch service, milk cartons are kept in crates without cooling instruments. If the SFA would like to incorporate cooling instruments to decrease food waste, a new Standard Operating Procedure (SOP) must be put in place. This SOP would need to address the length of time for which the milks are left on the cooling instruments as well as temperature procedures to ensure that the temperatures of the milks do not go above 41 degrees Fahrenheit. This SOP may be developed with the assistance of your local sanitarian.

Findings and Corrective Action Needed: Food Safety and Storage

**❑ Finding #8:** The food safety plan did not include a SOP for “Time as a Public Health Control” nor did it include a SOP referencing field trips.

**Corrective Action Needed:** Corrected on-site. No further action required.

**❑ Finding #9:** Per the SFA’s food safety plan and inspections, milk cartons must be discarded after service, as they are not temperature-controlled. However, the review team observed milk cartons put back into the refrigerator for future service.

**Corrective Action Needed:** Please submit a statement to the consultant assigned to your review explaining how milks during service will be handled. Whether that is discarding them after service or implementing cooling measures during service.

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**Buy American**

The USDA requires that a School Food Authority (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 as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- The following products may be exceptions to the Buy American provision: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- 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% of its agricultural food component, by weight or volume, from the U.S.,” This can be accepted in an email.
- What is acceptable to determine compliance on a label? 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 *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### **Reporting and Recordkeeping**

**Commendations:**

All records are retained for a minimum of three years plus the current school year. Thank you!

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

**Commendations:**

SBP outreach is conducted at the SFA before the beginning of the school year, and throughout the year as necessary. The SFA also conducts SFSP outreach before the end of the academic year. Thank you!

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](http://dpi.wi.gov/statesupt/agenda-2017)).



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