

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

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**School Food Authority:** Penfield Montessori Academy, Inc.

**Agency Code:** 408138

**School(s) Reviewed:** Penfield Montessori Academy (single site)

**Review Date(s):** 4/17/18–4/19/18

**Date of Exit Conference:** 4/19/18

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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 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](http://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](http://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 Penfield Montessori Academy for the courtesies extended during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet school nutrition program regulations.

The staff members involved in the child nutrition programs make efforts to accommodate the various needs of the students, including offering several serving sites within the school, assisting children with building their trays, and ensuring that tardy students can access breakfast.

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## **REVIEW AREAS**

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

#### **Community Eligibility Provision (CEP)**

##### **Technical Assistance:**

- Continue to maintain the approval packet for CEP, which support subsequent years' reimbursements. These certification records must be retained during the entire period the provision is in effect and for three years after submission of the final claim for reimbursement. Additionally, if open audit findings have not been resolved, records must be retained as long as required for the resolution the audit.
- CEP sites will need to inform the SNT annually of the intent to continue participating, or of any significant changes to participation (i.e. withdrawal or change of participating schools).
- As a reminder, the cost of Alternate Household Income Forms and any labor hours involved with processing/distributing them cannot be paid for from the nonprofit school food service account. Alternate Household Income Forms are not subject to verification, independent review of applications, and the certification and benefit issuance portion of the AR review. They must be kept separate from any USDA meal program records.
- For CEP, you are required to run direct certification at or near the beginning of the school year, for the Special Provisions Match Report. It is also a best practice to run DC for the full enrollment on or slightly before April 1 each year.
- The CEP Household Notification Letter must be sent to households annually at the start of the school year. This letter informs families that the agency participates in CEP and filling out any type of alternate household income form is not contingent on receiving free meals.
- The SFA notified households of the CEP meals offered using the DPI template CEP approval letter. The letter was distributed in the Thursday "take home" folder at the beginning of the school year. It could be beneficial to include the CEP approval letter to households in the parent handbook in addition to the Thursday folder.

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#### **Verification**

##### **Commendations:**

- The SFA completed the Verification Collection Report as required.

## Meal Counting and Claiming

### **Commendations:**

- The food service director does an excellent job ensuring that meals are counted correctly and recorded on check-off sheets. Students that elect to choose meals that are non-reimbursable are recorded on the check-off sheets and the meals are not claimed for reimbursement. It was clear that the food service director was knowledgeable about appropriately counting non-reimbursable meals served.
- The system in place to provide breakfasts to tardy students appears to be effective. The staff members responsible for serving and counting breakfasts for tardy students appeared well trained on the process.

### **Technical Assistance:**

- The agency will be eligible to apply for Severe Need Breakfast reimbursement in the 2018-19 SY. This can be done by electing the Severe Need Breakfast option during the annual online contract submission. For CEP schools, if the Identified Student Percentage (ISP) from the second preceding school year X 1.6 is greater than 40%, the agency qualifies for the additional breakfast reimbursement.
- It was noted that breakfast participation is consistently higher than lunch participation because more students have access to breakfast. Some of the youngest students are in school for a half day only and only have access to breakfast. The enrollment listed on monthly reimbursement claims must reflect the number of enrolled students with access to each meal. Students that are enrolled but do not have access to lunch should not be included in the enrollment number on the lunch claim. Additionally, the average daily attendance (ADA) listed on the lunch claim should be calculated by applying the average daily attendance percentage to the lunch enrollment number. This ADA calculation helps ensure that the number of meals claimed is reasonable compared to the expected number of students eating the meal daily.
- The SFA was using check-off sheets for breakfast and lunch for each class with each students' name listed. Because the SFA operates CEP SFA-wide, checking individual students off when they eat meals is unnecessary. A simplified check-off sheet that counts total meals as they are served can be used instead, which the SFA has begun utilizing recently.
- The SFA has recently begun claiming meals served to PEP students that come to the school building for childcare on weekdays when school is not in session, such as on teacher in-service days. Because these meals are served outside of regular school hours and attendance is optional, the meals cannot be claimed for reimbursement. See corrective action below.

### **Findings and Corrective Action Needed: Meal Counting and Claiming**

- Finding A:** The breakfast and lunch claims for the review period contained several errors. PEP meals were improperly claimed on several days during the review period—31 lunches and 14 breakfasts will be disallowed. These PEP meals are not eligible for reimbursement as described above. Additionally, errors during the process of transferring counts from check-off sheets to the edit check used for claim submission resulted in an underclaim of 10 breakfasts and 12 lunches. The combination of these errors resulted in a net overclaim of 19 lunches and net underclaim of 4 breakfasts. Fiscal action will be assessed for these claiming errors.

**Corrective Action for Finding A:** Submit a statement to the consultant describing how the counting and claiming processes will be adjusted to avoid these errors going forward.

- Finding B:** The current edit checks used for completing the monthly claims for reimbursement do not include an attendance adjustment calculation indicating the highest number of breakfasts or

lunches expected for any given serving day. Please reference the [CEP edit check template](#) for an example of a complete edit check that includes this required information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/cep-editcheck.xlsx>).

**Corrective Action Needed for Finding B:** Please submit an updated edit check form to the consultant that contains the required attendance adjusted information.

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## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Menus, OVS, and Crediting

#### **Commendations:**

- Thank you to Milwaukee Center for Independence (MCFI) and the staff at Penfield Montessori Academy for all they do to feed the children of Penfield Montessori Academy. The meals provided are healthy, great tasting, and well designed for health and variety. The time and effort spent preparing for and participating in the onsite review is much appreciated. All school staff were welcoming and professional. The food service staff had pleasant interactions with students during observed meal services. Kitchens and service areas were very clean as well. MCFI and school staff were available to answer questions, nice to work with, and receptive to feedback.

#### **Technical Assistance:**

##### Training

- It is recommended that anyone (including teachers) involved with the School Meals Program attend DPI training classes. The classes are offered in the summer and select other times throughout the year. Travel/meal expenses are allowable food service expenses for your program.
- The classes provide an overview of all areas of the NSLP and SBP requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Information on upcoming trainings can be found on DPI's [Training Page](#) (<https://dpi.wi.gov/school-nutrition/training#up>).
- Numerous webcasts are also available on DPI's [Webcast Page](#) (<https://dpi.wi.gov/schoolnutrition/training/webcasts>). The webcasts cover a wide array of topics including:
  - [CACFP](https://dpi.wi.gov/community-nutrition/cacfp/training/webcasts-cacfp) (<https://dpi.wi.gov/community-nutrition/cacfp/training/webcasts-cacfp>)
  - [Offer Versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#cyc) (<https://dpi.wi.gov/school-nutrition/training/webcasts#cyc>)
- The U.S. Department of Agriculture encourages schools to utilize [Smarter Lunchroom](#) techniques to encourage students to make healthy food choices ([https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp\\_ch6.pdf](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp_ch6.pdf)).
- Smarter Lunchrooms use research-based principles that lead children to make healthy choices but still offer a full spectrum of choice. All Smarter Lunchroom techniques are low- or no-cost, sustainable, and focus on improving the lunchroom environment to promote healthful eating behaviors. [Smarter Lunchrooms Strategies](#) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies>).

##### Offer versus Serve

- Some staff were a bit unclear about the Offer versus Serve (OVS) requirements for lunch and breakfast. Although students observed at lunch and breakfast took a reimbursable meal, it is important for staff (food service and teachers) to fully understand the OVS requirements.
- The [Offer Versus Serve Guidance manual](#) is available on our NSLP requirement website under the offer versus serve heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>).

- It was observed that all students were offered each item at breakfast and lunch. However, students were not asked if they would like a milk, they were asked which milk would they like. Taking milk is also a choice--students may decline milk. The regulations state that in order to have a reimbursable meal students must choose three of the five components and at least ½ cup of fruit and / or vegetable. Under offer versus serve students are not required to take milk as part of a reimbursable meal.
  - **TA was given on site, no further action needed, it is recommended that all staff view the OVS webinar found on the training page of the DPI NSLP page. [Offer Versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#cyc)** (<https://dpi.wi.gov/school-nutrition/training/webcasts#cyc>).

#### Family Style Meal Service

- [Family Style Meal Service](#) appears to be in line with the Montessori education model, this link will provide more information ([https://fnsprod.azureedge.net/sites/default/files/tn/Supplement\\_E.PDF](https://fnsprod.azureedge.net/sites/default/files/tn/Supplement_E.PDF)).
- The current service model is almost family style, it may be beneficial to explore the option.
- According to guidance, when using family style meal service, a sufficient amount of prepared food must be placed on each table to provide the full required portions of each of the food components for all children at the table, and to accommodate supervising adults if they eat with the children.
- Family style meal service allows children to make choices in selecting foods and the size of initial servings. Children should initially be offered the full required portion of each meal component. Supervising adults should actively encourage (but not force) children to try components and accept full portions during the meal. If a child refuses to take one or more food components, he or she should be offered that food again before the meal is finished.
- Milk is a required component to be offered to children when using family style meal service. Small, child-size pitchers are recommended for children to serve milk to themselves. Teachers may serve the milk when using family style meal service, however, children must be served the full serving of milk when doing so.
- During onsite observation, food was not on the tables, and children did not serve themselves. Children, based on their abilities, should be given the option to serve themselves. A teacher may help, but the child should lead. If instead children are served pre-plated meals, children must be provided with the minimum serving of each component.
- Additional resources are available on the Community Nutrition Team's [Nutrition and Wellness Training](#) webpage, under the Meal Service heading (<https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice>).
- The [USDA Offer versus Serve Manual](#) also contains information on family style meal service that may be useful if it is implemented with older students (<https://fnsprod.azureedge.net/sites/default/files/cn/SP41-2015av2.pdf>).
- **Contact Information:** 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).

#### 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 Coca Puffs cereal offered on the day of observation is above the sugar limit (8grams) 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). **TA was given onsite and no further action is needed.**

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

#### Production Records

- Production records are intended to be useful tools to record information prior to production, during production, and following production. One of the intents is that someone else (e.g. a substitute food service worker) could produce the planned menu.
- Be specific on production records about the identity, brand, and description of the items served. For example, listing each wg cracker by name on the production record, also before and after service counts is helpful in menu planning, forecasting, and purchasing for your students.
- Milk is a required component as part of the National School Lunch Program. Daily usage by milk type must be recorded on production records.

**Finding C:** Milk usage by type is not recorded on production records.

**Finding D:** Two different WG crackers were offered, both need to be correctly recorded. Oranges and apple sauce were offered, both need to be correctly recorded. Apple juice was offered and needs to be correctly recorded.

**Corrective Action needed for Findings C and D :** Send a full week of completed production records listing all items offered by name. Amounts left over of each item need to be listed. The milk usage chart needs to be completed including each type of milk, the amount started with (A), amount leftover (B), and amount used (A-B).

#### CACFP

##### Meal Pattern/Service

- 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).

##### Offer versus Serve (OVS)

- Offer Versus Serve (OVS) is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences.

- Preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service. For more information please visit 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>). See corrective action below.

❑ **Finding E:** K-3 and K-4 are not being served all of the meal components. Current meal service pattern is offer versus serve.

**Corrective action needed for Finding E:** Please submit a statement/plan going forward, for the 2018-19 school year stating how the meal service will change to meet the regulations.

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### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### **Commendations:**

- The district accountant does an excellent job keeping track of food service revenues and expenditures. Although a separate food service account is not utilized, a reliable system of accounting is utilized to ensure all food service costs are covered.

##### **Technical Assistance:**

##### 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. For the next school year, please work with MCFI to further break down expenses paid to MCFI currently listed on the AFR as “purchased services” into the sub-categories of food, labor, equipment, and other for each program.
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### 4. GENERAL PROGRAM COMPLIANCE

#### Civil Rights

##### **Commendations:**

- All school staff members completed the annual civil rights training. It is great that staff members outside of food service completed the training since the teachers and other staff are closely involved with the children’s meal times.

##### **Technical Assistance:**

##### Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free meals are available. SFAs must annually distribute the Public Release to:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need)
  - Major employers contemplating or experiencing large layoffs
  - Local Unemployment Office (as applicable)

- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

#### Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>). The SFA completed this form as required but it was not signed. Please be sure that the appropriate official provides a signature on the form when it is completed annually.

#### Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. The SFA's existing procedures for complaint processing could be used in the context of school meal program complaints, should they arise. However, the proceeding points must be considered.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. Be sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints ([https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)).
- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](https://fns-prod.azureedge.net/sites/default/files/113-1.pdf) resource (<https://fns-prod.azureedge.net/sites/default/files/113-1.pdf>).

#### Special Dietary Needs

- Collaboration between the school nurse, MCFI dietitian, and the food service director ensures that students with special dietary needs are accommodated appropriately. The medical statement used by the SFA is not the most updated DPI prototype. It is recommended that the SFA use the most current prototype going forward, as it was updated recently to better reflect USDA requirements. Please reference the [prototype Medical Statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>).
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to



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

- The SFA currently utilizes a student allergy summary list to assist in serving students with special dietary needs and requests. It is understandable that servers need access to this information, however care should be taken to maintain confidentiality of student allergy information. Please take steps to protect this information before, during, and after meal service. When the allergy list is on the serving cart it should be stored face down and referenced when needed.

### **Findings and Corrective Action Needed: Civil Rights**

- ❑ **Finding F:** The public release was not sent to a grassroots organization at the beginning of the current school year.

**Corrective Action Needed for Finding F:** Provide a statement to the consultant detailing how the public release will be distributed to at least one media outlet and at least one grassroots organization annually. Please include a description of how documentation that the public release was distributed appropriately will be retained.

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### **Local Wellness Policy (LWP)**

#### **Technical Assistance:**

#### **Wellness Policy Final Rule**

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.
- At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy. One way to recruit members of the general public to contribute to the LWP would be to advertise on the school's website the contact person for the LWP and encourage community members to reach out to this official to get involved.

#### **Content of the Wellness Policy**

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](#) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:
  - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
  - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)

- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

#### Triennial Assessment

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

#### **Resources:**

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.

### **Findings and Corrective Action Needed: Local Wellness Policy**

- ❑ **Finding G:** The LWP meets some, but not all, requirements as stipulated above. The current policy lacks required language pertaining to policy leadership, and updating/informing the public. Consider revising language pertaining to the triennial assessment after reviewing the requirements described above.

**Corrective Action Required for Finding G:** Please provide a timeline for updating the policy to become compliant with the final rule by adding language regarding the topics listed.

- ❑ **Finding H:** The LWP is not publicly available. It has been distributed to households, but is not available to the general public. Posting the policy on the school's website is one way that the policy could be made publicly available.

**Corrective Action Required for Finding H:** Provide a statement describing how the LWP will be made publicly available, including a timeline.

### **Professional Standards**

#### **Technical Assistance:**

#### **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.).
- Annual civil rights training can contribute to annual professional standards training hours. Additionally, time spent completing tasks for the administrative review, including face-to-face discussions with DPI staff during the on-site administrative review, can contribute to professional standards training hours.
- 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.
- The district accountant/authorized representative responsible for completing monthly claims, managing the online contract, financial management and accounting, and general oversight of the nutrition programs had completed civil rights trainings and at least the required four hours of training for the current school year. However, these completed trainings have not been tracked. The district accountant must begin their completed training hours on a tracking tool.

### Annual Training Requirements for All Staff by Position

- 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.

### New Food Service Director Hiring Requirements

- 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>).

### Findings and Corrective Action Needed: Professional Standards

- Finding I:** The online contract must be updated to reflect the name of the current food service director. Additionally, the online contract must be updated to reflect the actual grade levels at the school. The contract currently indicates that K3-8<sup>th</sup> grade is offered, however only K3-1<sup>st</sup> grade are enrolled for the current school year. Although the school is chartered for up to 8<sup>th</sup> grade, the online contract should only reflect the grades of the enrolled students with access to the meal programs each year.

**Corrective Action Needed for Finding I:** Please update the contract to reflect the correct food service director and grades of students in the school. Notify the consultant when the contract has been updated.

- Finding J:** The training tracker currently used to track professional standards training does not contain the amount of time spent on each completed training session. It also does not contain information about the number of hours worked in food service weekly by each staff member and their annual number of training hours required.

**Corrective Action Needed for Finding J:** Please update the training tracker so that it includes the number of hours each person works in food service weekly, each staff member’s number of required annual training hours, and the length of time for each completed training for this school year.

- Finding K:** The food service director hired as of 9/1/17 does not meet the minimum hiring requirements for a new director. Due to the small size of the SFA, the new food service director may be eligible for an exemption to this requirement.

**Corrective Action Needed for Finding K:** Submit a Professional Standards Hiring Exemption form to the Assistant Director of the School Nutrition Team, Karrie Isaacson ([karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov)). Please copy the consultant on the email message when the completed form is submitted.

- ❑ **Finding L:** The new food service director has not met the food safety requirement . Food service directors hired after July 1, 2015 are required to completed an approved food safety course within the last 5 years, or complete at least 8 hours of food safety training within 30 days of hire.

**Corrective Action Needed for Finding L:** Submit a plan with specific dates to the consultant detailing how the new food service director will meet the food safety requirements.

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### Water

#### **Commendations:**

- Water fountains in the hallways and pitchers of water with cups are available to students in their classrooms throughout the day. Great job providing water to students!
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### Food Safety

#### **Technical Assistance:**

- Please be sure that temperature logs are completed and retained for at least the federally required time period of six months following a month's temperature records, or the DPI recommendation of one school year following the date of the second annual food safety inspection. Temperature logs for food and food holding equipment should be thoroughly completed daily and retained.
  - Consider getting insulated milk bags to use to keep milk at the appropriate temperature throughout service. Working with the contact person at MCFI may be a way to obtain milk bags at a reasonable cost. If milk bags are not attainable, it is recommended to obtain larger and more ice packs to use in the milk crates during meal service.
  - To minimize the time milk is spent out of the cooler during service, it is strongly recommended to reduce the amount of milk on the meal service cart at any given time.
  - It is strongly recommended to work with the local sanitarian to ensure milk is handled safely and maintained at the appropriate temperature throughout meal service.
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### Buy American

#### **Technical Assistance:**

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance 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 Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.

- If no country of origin identified on label, than SFA must get certification from 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 accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that 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 the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be 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 manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The MCFI currently maintains a written procedure to ensure product received and inventory is compliant with the Buy American procedure.
- MCFI currently maintains all necessary documentation related to products purchased that are noncompliant.
- For information, the following is a [sample of written procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) and [Buy American monitoring procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america).

### **Reporting and Recordkeeping**

#### **Technical Assistance:**

- The SFA did not complete the Paid Lunch Price Report in the required timeframe in the current school year. This report must be completed for all SFAs, including those operating CEP.
- As a reminder, there are several reports that must be completed and submitted to DPI annually. The October lunch claim cannot be submitted until the AFR, FNS 10, and Paid Lunch Price reports are submitted.
  - Annual Financial Report (AFR) due by August 31<sup>st</sup>
  - FNS 10 report due by November 1<sup>st</sup>
  - Paid Lunch Price Report due between November 1<sup>st</sup>-15<sup>th</sup>
  - Verification Collection Report due between November 15<sup>th</sup>--February 1<sup>st</sup>
- Reference the [Reporting webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/reporting) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/reporting) and CEP [Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf) for detailed explanations of the required reports and deadlines (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf)

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

### Commendations:

- The SFA does an excellent job promoting the breakfast program offered at Penfield Montessori Academy and notifying families of local sites offering free summer meals.
- Breakfast participation is very high, which is likely due to the availability of breakfast throughout the morning to accommodate tardy students. The set up for breakfast in the cafeteria before school allows parents to walk in with their children if they choose and help them select a nutritious breakfast.

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Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. 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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



*With School Nutrition Programs!*