

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

School Food Authority: Destiny High School

Agency Code: 40-9863

School(s) Reviewed: Destiny High School

Review Date(s): February 21-22, 2018

Date of Exit Conference: February 22, 2018

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](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 do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Destiny High School for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for pulling records for the on-site portion of the review. And, lastly, thank you for the great rapport we observed between the staff and students during meal service.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance/Compliance Reminders

- The Community Eligibility Provision (CEP) is a **4-year reimbursement** option for eligible local educational agencies (LEAs) and schools participating in both the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that wish to offer free school meals to all children in high poverty schools without collecting household applications.
- Participating schools will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).
- REMINDER: For CEP, the current identified student percentage (ISP) and **claiming percentages are approved through the 2017-18 SY**. Ensure that you maintain all certification documents supporting your participation in CEP.
- LEAs electing schools to participate in CEP need to send in the [Agreement Form](#) and supporting documentation. **Applications will be accepted beginning May 1, 2018. The deadline to apply for SY 2018-19 is June 30, 2018.**
- **Destiny High School is in the 4th year of its 4-year CEP cycle and must reapply for the 18-19 SY.**
- REMINDER: For CEP, the SFAs that have 100 percent CEP schools are only required to run DC one time per year. This Special Provision Match is due to the Department of Public Instruction by October 31 and should only include students in CEP schools. In addition, we strongly encourage all SFAs to run DC each year on or around April 1, of their total student enrollment (only include students with access to at least one meal per day). The April 1 run is necessary for:
 - Determining if the SFA is eligible to reapply at the end of a four year CEP cycle.

Findings and Corrective Action Needed: Certification and Benefit Issuance

No findings.

Meal Counting and Claiming

Comments/Technical Assistance/Compliance Reminders

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>.

- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced and served as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

Findings and Corrective Action Needed: Meal Counting and Claiming

No Findings.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all of the staff at Destiny School for their warm welcome and cooperation during this Administrative Review (AR). The efforts to provide nutritious meals was very much recognized. The staff was positive, open to discussion, and worked well with the students. We enjoyed our time at your school.

Comments/Technical Assistance/Compliance Reminders

Training

It is recommended that anyone 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 \(https://dpi.wi.gov/school-nutrition/training#up\)](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).

Offer Versus Serve

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

When asked if students did not take a milk with breakfast would the meal be reimbursable, a point of service staff member said all students must take milk for a reimbursable meal. This is not correct, milk is only one of the offered components at breakfast. There is no requirement for a student to select milk under offer versus serve. However, all students must select at least half cup fruit, vegetable, or fruit/vegetable combination. Technical assistance was given onsite about the milk choice under offer versus serve.

Participation Improvement

Destiny High School is encouraged to join in on the [Smarter Lunchrooms Initiative](https://dpi.wi.gov/team-nutrition/smarter-lunchrooms) and create a cafeteria that encourages students to select healthy menu options by changing the lunchroom environment. (<https://dpi.wi.gov/team-nutrition/smarter-lunchrooms>)

The Smarter Lunchroom Initiative seeks to:

- Nudge students to unknowingly make smarter, healthier choices in the lunchroom.
- Increase sales by implementing innovative strategies that encourage student consumption of healthier foods.
- Implement low-cost/no-cost strategies that focus on changing the school lunchroom environment.

Please consider conducting a survey of your students to learn preferences. Included is a link to a USDA [Survey](https://www.fns.usda.gov/sbp/discover-school-breakfast-resource-materials) (<https://www.fns.usda.gov/sbp/discover-school-breakfast-resource-materials>) resource breakfast page that can be modified for a lunch survey as well.

Many Wisconsin high schools with a limited amount of time to eat and socialize have added “*grab and go*” items to their existing menu’s to increase participation.

Items such as:

- Salads – chef salads, garden vegetable salads, Tex-mex salads
- Sandwiches – pre bagged with fruit, vegetables, and any additional items needed to make it a reimbursable meal.

High school’s across Wisconsin have added flavor stations to their lunch counters and have seen increased participation. With low sodium options on the menu adding flavor (herbs and spices) can be seen as a way of personalizing each student’s meal. Expanding the current menu to include more scratch cooking and ethnic foods was discussed with the vendor.

With a closed campus you have a captive audience, use your cafeteria as another classroom.

Consider joining [Team Nutrition](https://www.fns.usda.gov/tn/join-team-become-team-nutrition-school) (<https://www.fns.usda.gov/tn/join-team-become-team-nutrition-school>) and receive free [Nutrition Education Materials](https://www.fns.usda.gov/tn/join-team-become-team-nutrition-school) (<https://www.fns.usda.gov/tn/join-team-become-team-nutrition-school>). An [order form](https://pueblo.gpo.gov/TN/TNPubs.php?NavCode=XA&CatID=6) (<https://pueblo.gpo.gov/TN/TNPubs.php?NavCode=XA&CatID=6>) is available as well. Additional lunch room [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) can be received free of charge as needed from the DPI (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Additional of a salad bar at the lunch meal would be a good way to give students choices in what they eat and result in increased participation. The [Salad Bar Grant](http://saladbars2schools.org/) (<http://saladbars2schools.org/>) could assist you in procuring a free salad bar. Students that are given choices are more likely to eat what they have taken. Please also see the [DPI’s Grant Page](https://dpi.wi.gov/school-nutrition/grant-opportunities) for more grant opportunities for your school (<https://dpi.wi.gov/school-nutrition/grant-opportunities>).

Breakfast in the Classroom

Breakfast participation ranges from 11- 62 students with most day being in the 20's or less. Research proves the benefits of eating breakfast for student includes better focus, less behavior problems, and better test scores. Please consider ways to improve your student breakfast participation. Many schools in Wisconsin have been successful in improving participation by serving [Breakfast in the Classroom](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_cr.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_cr.pdf), [Grab n'Go](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_gng.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_gng.pdf), [Mid-mo Nutrition Break](https://dpi.wi.gov/school-nutrition/grant-opportunitiesrning) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_mmn.pdf). Find information on these and other [School Breakfast](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) resources at (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Documentation

As a reminder, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the USDA Food Buying Guide for School Meal Programs. A complete CN label includes the following: CN logo, product name, and ingredient statement and inspection legend. It is important to save actual CN labels from product packaging that include these four things. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.

When a CN label is not available for a product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs.

Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Technical assistance was given onsite to the vendor. Updating the onsite documentation binder was discussed and will be conducted at a minimum of once a year and then as products/menus change. Many labels provided on-site were outdated and did not accurately represent the foods and meals currently being served.

Dietary Specifications

Major contributors of sodium include condiments (e.g. Ranch), regular canned vegetables, deli meats, dairy products, cheese, and processed food items. It is recommended to purchase products that are labeled reduced-sodium, low-sodium, or no salt added. As a rule of thumb when reviewing nutrition facts labels, sodium with a percentage higher than 20% is an indicator of a high-sodium product.

Another way to ensure a low-sodium product is to prepare and serve more fresh fruits, vegetables, and minimally-processed items. As many of the menu items were canned or processed, consider incorporating

more fresh fruits and vegetables into your menu to help decrease sodium and increase variety. Be aware of full-fat condiments and menu items and purchase low- or reduced-fat varieties of condiments, dairy products, and other processed items.

Transport Sheets/Production Records

Transport Sheets/Production records are intended to be useful tools to record information prior to production, during production, and following production. The production record template currently in use is out of date and uses columns that are not currently applicable (e.g. Time 11-12, Process 1, 2, 3). Furthermore, there is missing information, such as actual portion size (example weight in grams or ounces of chicken patty), how the food item credits towards the meal pattern, actual milk usage by type, planned portion size, and leftovers. While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements (“Must Haves and Nice to Haves” list) can also be found at that link.

Be specific on production records about the identity, brand, and description of the items served. The production records should reflect actual planned number of servings, which should be forecasted based on historical data to decrease food waste.

Technical Assistance was given onsite regarding the documentation of leftovers at the end of meal service. A copy of the completed production record needs to be given to the vendor, with regards to leftovers as well as temperature logs.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Standardized Recipes

Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient (even if it is water) should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service kitchen. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Standardized recipe are needed for menu planning to ensure that the portions offered are actually what is intended. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA’s *What’s Cooking?* quantity recipes, especially when substitutions are made.

Continue to use the resources on our website regarding [recipe standardization](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). 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.

Meal Pattern Requirements

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select.

[Meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) requirements can be found at (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>). The menu must meet the daily and weekly, including vegetable subgroups, independently, the “[In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf)” document is provided as well. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>).

Finding # 1: Standardized recipes are required for all menu items that have more than one ingredient. The following menu item served during the week of review did not have standardized recipes.

Corrective Action Needed: Please submit standardized recipes for:

- Macaroni and Cheese served 01.08.18
- The Nacho meat served 01.11.18
- The Nacho cheese served 01.11.18
- BBQ Chicken 01.12.18

Finding # 2: During the week of review there was a ¼ cup weekly shortage of red/orange vegetables. On 01.10.18 one cup of carrots was offered, this meets the daily vegetable minimum but does not meet the weekly minimum of 1 ¼ cup.

Corrective Action Needed: Please refer to the corrective action under finding # 3

Finding # 3: There was no “Other” vegetable subgroup offered during the week of review. A minimum of ¾ cup “Other” vegetable required over the course of the week.

Corrective Action Needed: Please submit a menu planning worksheet for Lunch for the week of review (January 8th -12th, 2018) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-9-12.doc>), showing that all quantities (including the vegetable sub groups) will be met.

Please refer to the [Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) for daily and weekly requirements (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>).

Once all crediting documentation and updated standardized recipes have been received 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. Thank you.

SMART SNACKS

At Destiny High School one vending machine was found in the cafeteria and it is [Smart Snack](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) compliant (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). This link also includes information (webinars, tracking tools, and guidelines) to help your organization should you choose to allow fundraising and additional food items to be sold.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance/Compliance Reminders

- How to locate the agency's Child Nutrition program Report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, was reviewed with the business manager. We also reviewed how to access the Aids Register, to track all program deposits made to the agency's account. The Aids Register also shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.
- **It's time to start evaluating your equipment needs!** USDA has released Memo SP 34-2017, regarding the Fiscal Year 2017 National School Lunch Program, Equipment Assistance Grant. [The application period is January 23 - March 9, 2018.](#)
- Priority for this grant will be given to schools that have not received similar USDA equipment grants in the past and have 50% or higher free and reduced-price eligibility. **Requested equipment must cost more than your School Food Authority's (SFA) definition of capitalization threshold or \$5,000, whichever is less.**

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at

which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
 - **A cost analysis of expenses versus revenue could help to determine the cause of the need to transfer funds into the food service account from the nonprogram (or school/general) fund.**
 - **Excess leftovers/extra food at the end of service was observed**
 - **Templates, available on DPI's website, for a productivity study of [meals per labor hour](#) could define staffing needs**
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance".
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
 - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
 - Under "Purchases Services" you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under "Ala Carte", you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

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

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges.

- For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>)
- For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance:](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>)
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- The requirement to develop a meal charge policy applies to the SFA rather than to individual schools within the SFA. **If all schools in an SFA operate a non-pricing provision (such as CEP or Provision 2), the SFA is not required to develop a meal charge policy, as no children would be charged for meals.** Though not required, SFAs currently operating a non-pricing provision, district-wide, may consider developing a meal charge policy that would be available and ready for implementation in situations where a school (or schools) in the district return to standard counting and claiming.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding:** Second entrees, second milks and milk-only are offered to students which are not part of the reimbursable and are considered nonprogram foods. These entrée and milk costs cannot be absorbed by the non-profit food service account. Either the items need to be charged to the students at nonprogram food prices, or the items need to be tracked and a transfer of funds made from non-federal sources into the food service account for the full cost of items offered.

Corrective Action Needed: Please submit a plan as to how these nonprogram second entrée costs will be covered at Destiny High School for the 17-18 school year.

Revenue from Nonprogram Foods

Comments/Technical Assistance/Compliance Reminders

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

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool

(<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

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

Resources

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

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).
However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.
- 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 Complain 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).

Findings and Corrective Action Needed: Civil Rights

- **Finding #1:** Incorrect Nondiscrimination Statement in use on menus that are posted in cafeteria.
Corrective Action Required: Corrected on-site. No further action necessary.

- **Finding #2:** SFA does not have an established complaint policy for receiving and processing complaints alleging discrimination within the school meals program.
Corrective Action Required: Corrected on-site. No further action necessary
- **Finding #3:** SFA did not publish the correct Public Release. For CEP schools, the CEP Public Release must be used. A Public Release sent out with income eligibility guidelines is confusing to households and families; it would cause families to think that they will have to pay for meals, which is not the case.
Corrective Action Required: Corrected and sent on-site. No further action necessary.

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

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

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the *Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit*. This can be accessed electronically at <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).
- **The first assessment should be completed within three years of the policy being updated, but no later than June 30, 2020 to be in compliance with the final rule.**

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). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Local Wellness Policy

No findings.

Professional Standards

Comments/Technical Assistance/Compliance Reminders

- Nice job on the part of the part time food service worker who has already acquired 20 hours of professional standards training in 2017. Way to go!

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

- **Annual Training Requirements for All Staff**

Directors: 12 hours

Managers: 10 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

If hired January 1 or later, only half of the training hours are required during the first school year of employment

Findings and Corrective Action: Professional Standards

- **Finding #1:** The Food Service Director and one full time food service staff member have not completed the minimum training hours require for the year, as of the time of the review.
Corrective Action Needed: Please provide a plan for meeting the needed training hours for the current year.

- **Finding #2:** Training is not being monitored on a tracking tool.
Corrective Action Needed: Include all current training hours for each food service employee onto the [DPI tracking tool](#) and submit as part of corrective action.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety Plans

- The Food Safety Plan was available for review. It was apparent in observing the food service employees at work that they are aware of food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- All schools must have a comprehensive, **site-specific food safety plan** on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan **must be reviewed annually**. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Time/Temperature Control for Safety (TCS) Food

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

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.
 - More information and sample SOPs can be found the [DPI food safety page](#). Additional food safety information can be found in the [Wisconsin Food Code facts sheets](#).

Findings and Corrective Action: Food Safety

- **Finding #1:** Food safety plan is missing a sanitarian-approved SOP for Time as a Public Health Control. Pans of hot food sitting on top of pans in steamtable.
Corrective Action Needed: Create SOP for Time as a Public Health Control. Submit copy of SOP with sanitarian approval as an attachment to assigned DPI Nutrition Program Consultant via email.

Buy American

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 SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures (<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>).

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 noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

- ❑ **Finding:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:
- Canned mandarin oranges from China
 - Bread crumbs from Canada
 - All Gordon Food Service Spices - no country of origin

Label does not identify country of origin:

In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the TA notes above for sample certification language. Many products in the dry storage and refrigerator were not labeled with a country of origin, substituting this information for "manufactured by" or "distributed by". This made identifying compliance and noncompliance with the Buy American Provision challenging. As part of Fond du Lac School District's Procurement Review, SNT will check that the procurement manual includes language pertaining to Buy American. An additional attestation from food service's distributors and/or vendors may be required. Further information is available on the USDA Foods [Buy American Provision](#)

webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>). This will be treated as TA for the 2017-18 school year, but work with your distributors and/or vendors to move toward compliance.

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

Comments/Technical Assistance/Compliance Reminders

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

Breakfast Promotion

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

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

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)
- National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.
- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Destiny High School, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

For more information on Summer Feeding option contact:

Amy J. Kolano, RDN, CD
 Summer Food Service Program Coordinator
 Phone: 608.266.7124
 e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action: SBP and SFSP Outreach

- ❑ **Finding #1:** No summer food service outreach is provided to students.
Corrective Action Needed: Please provide a statement that Destiny High School will notify households of how to find the nearest Summer Foodservice Program using the [DPI program finder](#).

5. COMMUNITY ELIGIBILITY PROVISION (CEP) AND PROVISION 2

Comments/Technical Assistance/Compliance Reminders

- You will want to make sure that you maintain all certification documents supporting your participation in CEP. REMINDER: the current identified student percentage (ISP) and claiming percentages are approved through the 2017-2018 school year; a four year cycle. CEP participating schools will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).
- [USDA Community Eligibility Provision guidance](http://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) has been expanded in memo SP 54-2016 (www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) to allow for the use of one form for both meal eligibility and as an alternative household form to be used in CEP schools. This may alleviate confusion among households and administrative staff at a mixed district. This memo clearly outlines the requirement to cost-allocate expenses back to the district for processing and distributing forms in CEP schools. CEP applications and labor hours involved with processing them cannot be paid for from the nonprofit school food service account.
- There must also be a method to accurately distinguish between forms from students in CEP vs. non-CEP households. CEP applications are not subject to verification, independent review of applications, and the certification and benefit issuance portion of the AR review; nor do these students carry individual meal eligibilities that can extend benefit to other students.

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

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



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