

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

School Food Authority: Oconto Falls School District

Agency Code: 42-4074

Review Date(s): May 1-3, 2018

School(s) Reviewed: Oconto Falls High School

Date of Exit Conference: May 3, 2018

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage (http://www.fns.USDA.gov/healthierschoolday). The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products.
- [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 Oconto Falls School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond

to the off-site questions and requests, as well as pulling records for the on-site portion of the review; this effort was appreciated and led to a shorter onsite review time. Both the district office and the Food Service Management Company, Taher, Inc. cooperated with requests for review questions.

The DPI review team appreciates the eagerness of the staff at Oconto Falls School District for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu options, customer service, and beautiful signage. We were impressed during meal service that students understood what items to select for a reimbursable meal and if it was not reimbursable the cashier was knowledgeable to ring up individual items.

The DPI review team is confident that Oconto Falls School District will continue to improve their knowledge and operation of child nutrition programs. With some staff new in their positions, it is recommended they participate in trainings offered during the summer or through webcasts.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Three hundred and three eligibility determinations were reviewed, with no errors identified. Nice work!
- At the beginning of the school year, households in the carry-over period are given reminders to reapply for meal benefits.
- The notification letters have been updated to contain the complete updated nondiscrimination statement.
- Other Source Categorical Eligibility status for students determined as homeless, migrant, or runaway has the status confirmed by an appropriate program official before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.
- The information provided by the family on the free and reduced price application is used only for determining eligibility for meal or milk benefits. Should the SFA decide to offer other benefits, the household must be provided an opportunity to accept any other benefit before a child's status can be disclosed.

Free and Reduced Price Meal Applications

- Applications are reviewed in a timely manner. An eligibility determination is made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency, the determining official correctly uses the [Income Eligibility Guidelines](#) to process the application; if there are different frequencies of income, the application is determined with an annual total income for the household

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Technical Assistance:

- Updates to the determining, confirming and verifying officials must be made on the online annual contract to reflect the operations in the SFA.

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

Public Release

- The Public Release is not to be sent to households, as it includes the specific income amounts for free or reduced benefits.
- SFAs are not required to pay to have the public release published, but must maintain documentation of whom it was sent to along with the specific materials distributed.

Limited English Proficiency (LEP)

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

Transferring Students

- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Findings and Corrective Action Needed – Public Release

❑ **Finding # 1:** All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc>). The purpose is to inform the public that free and reduced price meals and free milk are available. Oconto Falls School District was not able to provide proof of submitting a public release to the required entities. SFAs must annually distribute the Public Release to:

- Local news media
- Grassroots organizations (local organizations providing services to populations in need)
- Major employers contemplating or experiencing large layoffs
- Local Employment Office (as applicable)

Corrective Action Needed: Submit a plan of how this requirement will be accomplished and the title of the staff to complete this task.

Verification

Commendations:

- Two applications were verified for correct meal benefits and another was processed as verification for cause.

Technical Assistance:

- A household selected for verification is sent a letter to comply with confirming their eligibility benefits and given a due date; if they do not reply by the due date, the verifying official must attempt to contact the household at least one more time before terminating meal/milk benefits.

Compliance Reminders:

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed - Verification

Finding # 2: The confirming official must sign the reverse side of the household application or use a tracker form as found in this [packet of resources](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx) to track the progress of the verification process and the outcome (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>). At this SFA, the district accountant is both the confirming official and verifying official. The verifying official must also sign the application or tracker when the process is complete.

Corrective Action Needed: Submit a statement of the confirming official and verifying official’s plan to complete those duties and sign the application or tracker during the verification process.

Resources:

- A [verification packet of resources](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx) contains a useful tracker of the verification process (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>).

Meal Counting and Claiming

Commendations:

- Before submitting the claims, the school nutrition department runs an audit report and reviews the Skyward edit check, Accuclaim, to verify meal counts.

- The SFA provides meals for field trips as requested and feasible. 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>).

Technical Assistance:

- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
 - REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.
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2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all the staff at Oconto Falls School District for their cooperation during this Administrative Review. We appreciated the staff and Food Service Director's willingness to ask questions and to learn. We commend the staff for mastering the requirements of Offer vs. Serve. Reviewers also appreciated the colorful signage in the cafeteria and the many vegetable options for students. Keep up the great work!

Comments/Technical Assistance/Compliance Reminders

Meal Pattern - Week of review

As part of the Administrative Review, a week from the month of March (March 12-16, 2018) was reviewed for meal pattern compliance. Production records, recipes and crediting information for products served were reviewed for completeness and accuracy. The following issues were noted:

- Wednesday
 - French Toast Sticks provided only 1 oz eq grain
 - Daily grain shortage at lunch
 - High School requires a minimum of 2 oz eq grain daily
- Friday
 - Fish Sticks provided only 1.5 oz eq grain
 - Daily grain shortage at lunch
 - High School requires a minimum of 2 oz eq grain daily

Technical assistance was provided to the food service director for adding an additional grain to these meals.

Production Records

Production records are required to document that food served to students meets meal pattern requirements. Technical assistance was provided to update production records to fix the following issues:

- Beef patty credits as 2 oz eq meat/meat alternate but production record had it listed as 1.5 oz eq meat/meat alternate.
- Meat/meat alternate options on the gourmet salad bar listed tongs as the serving utensil, however, these are being portioned into PC cups. Therefore, the verbiage on production records should be updated to reflect current practices.

- Breakfast sandwich credits as 1.25 oz eq meat/meat alternate not 2.5 oz eq meat/meat alternate as listed on production records

Thank you to the Food Service Director for updating the production records on site!

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

X **Finding #1 Meal Pattern:** Daily grain shortage at lunch on Wednesday (French Toast Sticks) and Friday (Fish Sticks) of the week of review (March 12-16, 2018).

Corrective Action Needed: Submit a statement that explains what will be done with the French Toast Stick and Fish Stick meals so that a grain shortage at High school will not occur again in the future. Include an updated menu. **Completed on site; thank you!**

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations:

- The school nutrition department and district accountant work together to code invoices for annual financial category breakdowns.

Food Service Management Company (FSMC)

- The following duties may not be delegated to the FSMC and it was noted that these duties are operated correctly:
 - Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year. It is due February 1 annually and the documents are kept onsite.
 - Signature Authority – a representative of the SFA must sign off on the contracts for the SFA.
 - Edit Checks- an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software.
- Costs from the FSMC are reviewed by the district for accuracy and payment process.
- The school nutrition director and team meet with a student advisory council to discuss menu ideas and products to sell. Nice work!

Compliance Reminders:

Unpaid Meal Charge Policy

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

Technical Assistance:

- A more effective communication process must be provided to staff in administering the Unpaid Meal charge policy. Cashiers, school nutrition staff, office personnel and parents need to have the Unpaid Meal policy be provided the same information.
 - The policy may differ by school levels.
 - There was discussion about tracking any alternate meal that is given to students denied a reimbursable lunch because of a negative balance level. A suggestion was to set up a button for the mini meal so it tracks that the student received the mini meal and as a way to send an invoice to the district accountant to pay for those mini meals out of an account other than Fund 50.
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Paid Lunch Equity (PLE)**Commendations:**

- The PLE for School Year 2018-19 was recently completed and indicated a seven cents increase is needed to comply with the USDA weighted average price. However, an exemption was granted for Oconto Falls School District to be released from the price increase requirement.
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Revenue from Non-program Foods**Commendations:**

- The school nutrition department has been working to complete the non-program food revenue calculator which provides information to complete the USDA non-program foods revenue tool.

Technical Assistance:

- Continue to evaluate the prices and items listed in the non-program foods revenue calculator as the noted deficit may have an impact on the annual financial report in the non-program foods line.
 - School nutrition staff and the district accountant will continue with training at summer classes or DPI webcasts on this subject.
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4. GENERAL PROGRAM COMPLIANCE**Civil Rights****Commendations:**

- The required “And Justice for All” poster is posted in public view where the program is offered.
- Civil rights training is conducted annually for all school nutrition staff and is included in the training trackers.
- The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) form was completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

Technical Assistance:

- Others who administer any portion of a school nutrition program, like the district accountant, those who assist households with application materials in other languages and those who work with IT must also complete the training and sign off.

Compliance Reminders:

Nondiscrimination Statement

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

Overt identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It is necessary for cashiers to give proper meal advice to students so symbols identify the student’s status; it is best practice to change the identifying symbols periodically.

Special Dietary Needs

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

Processes for complaints

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

On-site Monitoring

Compliance Reminders:

- Every school year, each SFA with more than one school must perform at least one on-site review of the meal counting and claiming system and the readily observable general areas of review

identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.

- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our Administrative Review webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

Findings and Corrective Action Needed – Onsite Monitoring

❑ **Finding # 3:** The onsite monitoring form was provided to the reviewers for the high school site only for lunch and breakfast meals. Please check that answers for the readily observable areas are correctly reviewed.

Corrective Action Needed: Provide a statement of the plan to complete an onsite monitoring for all school sites which participate in National School Lunch Program and School Breakfast Program, as required, and the titles of the staff to complete that task. Note that the due date for this task is by February 1 each school year.

Local Wellness Policy

Compliance Reminders:

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.
- At a minimum the wellness policy must include:
 - Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
 - Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
 - Standards for all foods and beverages provided, but not sold, to students during the school day.
 - Plan for measuring policy implementation.
 - Designation of one or more officials as being ‘in charge’ of the policy.
 - An assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Findings and Corrective Action Needed – Local Wellness Policy (LWP)

❑ **Finding # 4:** Oconto Falls School District’s Local Wellness Policy (LWP) was not presented for DPI review before or during the AR. As noted in the summary report of the Administrative Review in 2014, the LWP had not been updated since the original policy – corrective action at that time required a plan and timeline to meet current guidelines.

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to include language that:

- a) identifies the official responsible for LWP oversight,

- b) permits the public to participate in LWP development, implementation and review,
- c) school meals will adhere to meal regulations,
- d) food sold outside of the school meal programs must adhere to Smart Snacks rule,
- e) defines guidelines for foods provided but not sold,
- f) address food and beverage marketing,
- g) at least one goal in Nutrition Education is included,
- h) at least one goal for Nutrition Promotion with evidence-based strategies, and
- i) at least one goal for Physical Activity included,
- j) includes at least one goal for Other School-Based Strategies for Wellness,
- k) include language regarding completion of a triennial assessment, at a minimum, and
- l) to specify how the LEA will inform and update the public about the content and implementation of the LWP.

Corrective Action Needed: Provide a detailed plan of the process to update the District's Local Wellness Policy and provide a timeline for updating the policy to become compliant with the final rule.

Resources:

- [Local Wellness webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) on the DPI website, which includes many resources: (https://dpi.wi.gov/school-nutrition/wellness-policy)
- [Wellness Policy Builder](https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1) provides language to update the district LWP: (https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1)

Smart Snacks in Schools

Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. The school day is defined as the period from the midnight before to 30 minutes after the end of the instructional school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption.

The following product was found to be non-compliant with Smart Snacks standards:

- Baker Boy Cinnamon Roll - sodium exceeds 200mg

Reviewer also took note of a flyer posted in the hallways promoting popcorn sales every Friday. The sales go towards the FBLA group. After further review, there is no standardized recipe in use (standardized measuring utensils not being used) for making the popcorn, nor has the popcorn been evaluated for Smart Snacks compliance. Technical Assistance was provided and included an overview of Smart Snacks regulations and a compliant popcorn recipe was given.

Here is a brief review of two situations by which an organization may sell foods and beverages to students during the school day.

1. If foods and beverages sold *are* Smart Snack compliant:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This includes nutrition facts labels for purchased foods or beverages, or recipes

for anything that is made from scratch. It is also helpful to keep printouts of the results page from the [Smart Snacks calculator](https://foodplanner.healthiergeneration.org/calculator/) (<https://foodplanner.healthiergeneration.org/calculator/>).

2. If foods and beverages sold *are not* Smart Snack compliant:
 - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
 - b. Exempt fundraisers **cannot** occur in the meal service area during meal times.
 - c. Someone in the school must keep track of the exempt fundraisers.
 - i. Best practice is to have one person in charge of receiving and tracking fundraisers, this is typically someone in the district office, who is aware of what is going on in the school. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks.

You can find more information on our [Smart Snacks](#) webpage, including the [Smart Snacks in a Nutshell](#) handout, and templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Compliance Reminders:

- Second meals are no longer permissible to be sold because a whole meal would not meet the Smart Snacks requirement. Meal items can be sold separately as non-program foods if they comply with the Smart Snacks requirements.

Findings and Corrective Action Needed: Smart Snacks

Finding #1 Smart Snacks: Baker Boy Cinnamon Roll does not meet Smart Snack standards.

Corrective Action Needed: Discontinue the use of this product. *Completed on site, no further Corrective Action required. Thank you!*

Finding #2 Smart Snacks: FBLA fundraiser selling non-compliant popcorn.

Corrective Action Needed: Provide a statement with a time frame in which the popcorn sales will be brought into compliance. Include in your statement whether or not you will start using the compliant popcorn recipe provided. If you choose to use a different recipe, you must submit the nutrition facts labels, ingredients lists and a standardized recipe with instructions for how to make the popcorn. Include the recipe's total yield and individual serving size.

Finding #3 Smart Snacks: Fundraisers being held during the school day (e.g., FBLA popcorn sales) are not being tracked adequately.

Corrective Action Needed: Submit a written statement with the name of the person who will be in charge of tracking fundraisers and what tracking tool will be used. You may choose to use a DPI

tracking tool, or you may create your own as long as it contains all the required information as noted above in the technical assistance. These tools are located on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage under the Resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Professional Standards

Commendations:

- The school nutrition director tracks trainings of all staff in that department as trainings occur annually.

Technical Assistance:

- The district accountant position in the midst of a transfer of duties to a new staff person.
- The district accountant must complete training and track the hours. Topics pertinent for the accountant are to understand the annual financial report, claim manual, permanent agreement and contract renewal process, eligibility manual for meal application and verification and the entire verification process.

Compliance Reminders:

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).

Professional Standards: Training Requirements

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

Annual Training Requirements for All Staff

Directors: 12 hours

Managers: 10 hours

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

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

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

Food Safety, Storage and Buy American

Commendations:

- Food safety inspection reports are posted in public view.
- [Employee Health Reporting Agreements](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) are signed for each employee when they are hired (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf). The School Nutrition Director plans to review the points on the agreement at back-to-school meetings annually.
- This SFA has wonderful record-keeping, including food temperature logs, equipment temperature logs and master cleaning schedule.
- Food safety inspections are conducted twice a year by a local sanitarian.
- The food safety (HACCP) plan is site-specific for each kitchen and contains the required elements for site information and standard operating procedures (SOP).
- [A Flash of Food Safety](http://www.fns.usda.gov/ofs/food-safety-flashes) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

BUY AMERICAN PROVISION

Comments/Technical Assistance/Compliance Reminders

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

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating that the product, “was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can be accepted in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected

distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.

- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the Introduction to the Procurement Policy and Procedures Handbook (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>).
- Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

The SFA may choose to use DPI's [template to track non-compliant products](#) or they may use their own (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>). If they choose to create their own template, it must include the following information:

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

You may record additional information if you find it beneficial. More information on this new requirement can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American Provision

❑ Finding #1 Buy American: The following products were identified in the storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List:

- Cooking oil Villa Frizzoni - Canola oil from Canada and EVOO from Spain, Tunisia, Turkey, Greece and/or Morocco.
- Canned Olives - Spain
- Granulated Garlic - China
- Canned tuna - Thailand

Corrective Action Needed: Include these items in your non-domestic documentation. Provide the completed forms as corrective action. ***Completed on site, thank you!***

Reporting and Recordkeeping

Commendations:

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
 - All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.
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School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach

Commendations:

- Breakfast outreach communication is presented to households at the beginning of the school year, in the student handbook and notices to households during the year.

Technical Assistance:

Breakfast Promotion

- 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>).

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 Oconto Falls School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text ‘Summer Meals’ to 877-877 to find Summer sites
 - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
 - For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov
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5. OTHER PROGRAM REVIEWS

Wisconsin School Day Milk Program (WSDMP)

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5th grade. This SFA enrolls only Early Childhood and Pre-Kindergarten students in this WSDM program.

Compliance Reminders:

- Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one.
- Per the Agreement for the WSDMP in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and include that stipulation in the SFA’s milk bid.
- A new WSDMP [application agreement/policy statement](https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc) (https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc) must be submitted with an accurate and acceptable process of the point of service.
- WSDMP allows juice as a milk substitution and is reimbursable on the annual claim submission.
- Milks sold to students eligible for paid meals, must be referenced as a non-program food in the annual financial report and entered in the non-program food revenue tool.

Findings and Corrective Action Needed -

❑ **Finding # 5:** As stated in the 2014 Administrative Review summary report, the same finding for inaccurate point of service (POS) counts existed. “Note: State of Wisconsin regulations require that milks claimed for reimbursement under the WSDMP be claimed based on an accurate and acceptable point of service count. Milks may only be counted when they are checked off at the point of service when the student receives the milk. Lists based on absences, marking those who didn’t take a milk, end of the month counts or payment records are not allowed. Milks claimed under any other counting procedure other than an accurate point of service count must be disallowed and funds reclaimed.”

A reclaim of milk reimbursements will not be assessed at this time, as it is noted that teachers have been trained correctly but some are not following correct procedures. It should be noted that one of the three classrooms where milk program was observed entered check marks in the Skyward program for only the students who selected milk that day- this is an accurate and acceptable process. The other two had all students pre-checked and then deleted the check mark when the student did not select milk on that day- that is not an acceptable practice and needs to be corrected.

Corrective Action Needed: Submit a statement indicating an accurate and acceptable process of checking off students at the POS and how that process will be communicated to all classroom teachers in the WSDMP.

Resources:

- WSDMP [Claim Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wsdmp-en-claims-manual.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wsdmp-en-claims-manual.pdf).

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

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



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