

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

School Food Authority: Riverview Evangelical Lutheran School Agency Code: 44-0147

School(s) Reviewed: Riverview Evangelical Lutheran School

Review Date(s): 11/30/18

Date of Exit Conference: 11/30/18

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).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Riverview Evangelical Lutheran 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 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- All applications were correctly approved and direct certification had been run in the appropriate timeframes.

Verification

Commendations/Comments/Technical Assistance/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, but these verifications are not considered part of the Verification sample. For more information, refer to the current [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).
- 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 #1:** The applications chosen for verification did not have the confirming official signature recorded on the back of the application.

Corrective Action Needed: Please provide a statement that going forward all applications chosen for verification will be confirmed and have recorded on the back of the application the confirming official signature.

Meal Counting and Claiming

Commendations/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.
- DPI has created [Field Trip meal resources](#) to help schools offer student meals every school day. Field trip meals must be charged to the student at the time of delivery of the reimbursable meal. If students do not come to cafeteria to pick up field trip meals, they must be checked off as the student receives the meal.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff and volunteers at Riverview Evangelical Lutheran School. We appreciate your time and efforts spent preparing for and participating in the onsite review. The food service director was very receptive to all feedback given during the onsite review and showed great interactions with students during lunch service. Thank you for all that you do for the students of your school!

Comments/Technical Assistance/Compliance Reminders

Training

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage, under Upcoming Trainings (<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 [SNT Webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts) webpage (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes.

- The number of reimbursable and non-reimbursable (adult) meals planned and served is required to be on the production records. Currently, the number of planned meals includes both Riverview Evangelical Lutheran School and the preparation school in Appleton Area School District and the number of meals served is recorded on a separate paper. Please ensure the site-specific numbers are written in on the daily production records going forward.
- Continue to be thorough in recording all leftovers on your production records.
- If extra items are added to the planned menu, such as additional fruit and vegetable options, please ensure that these items are recorded on the production record. Include the serving size, prepared amount, and leftovers as well.

A list of production record requirements ("[Must Haves and Nice to Haves](#)") and sample production record templates can be found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Crediting

SFAs are required to document how foods offered credit towards weekly meal pattern requirements. Sources of this information include the USDA *Food Buying Guide*, Child Nutrition (CN) labels, and product formulation statements (PFS).

- The [USDA Food Buying Guide for Child Nutrition Programs](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on "food items search" and type in a specific food in the "keywords" search box. Many different options may appear. Find the one that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.
- Most fruits and vegetables credit by volume served (e.g., ½ cup peaches, drained will credit ½ cup fruit) and the FBG will note if the crediting is different based on volume served (e.g., one medium banana credits ½ cup fruit). Most meat/meat alternates and grains credit by weight (i.e., 2 ounces of cooked, plain chicken breast credit 2.0 oz eq meat/meat alternate; 1 ounce brown rice credits 1.0 oz eq grain). If the product is not listed in the FBG, additional crediting documentation is required.

- Raw, uncooked leafy greens credit for half the volume served in their fresh forms. For example, ½ cup of fresh, baby spinach credits as ¼ cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces, even if they are not in the dark green subgroup. If leafy greens are cooked, such as steamed spinach, they credit as the actual volume served.
- Any processed product that is not listed in the USDA *Food Buying Guide* for Child Nutrition Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to credit toward the meal pattern. A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).
- If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for Child Nutrition Programs, it may not be credited when served as part of the USDA School Meal Programs.
- Remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well.
- More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).
- Additional training on crediting is available in our webcasts for each meal component. Visit our [webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) webpage and look for the Fruits, Vegetable, Grains, Meat/Meat Alternate, and Milk training webcast links. (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Crediting Grains and Exhibit A

Grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). Exhibit A is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1.0 oz eq for each specific group (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). Exhibit A groups all grain products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:

- Group A: these products are hard and crunchy, dry and lightweight. Per ounce, they contain a good deal of grain.
- Group B: whether serving bagels, pizza crusts or tortillas, 1.0 ounce of these products all credit the same towards the meal pattern (1.0 ounce by weight = 1.0 oz eq grain).
- Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1.0 ounce of pancake does not credit as 1.0 oz eq like a slice of bread does. More of the product by weight will need to be served to credit as 1.0 oz eq grain.

Exhibit A can be used to credit any of the products that appear in the table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS. If a product is not listed in Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the *grams of creditable grain* in the product. Divide this number by 16 grams per ounce equivalent to calculate the grain contribution for that product.

Continue to use the available training and resources from the DPI School Nutrition Team, as your school is ultimately responsible for ensuring the meals planned and prepared by Appleton Area School District meet all meal pattern requirements for your students.

Determining Serving Sizes for Fruits and Vegetables

The appropriate serving size for items, such as baby carrots or pepper strips, that do not fit neatly into spoodles or measuring utensils may be determined with a quick process. To do so, dice the product so that it fits into a measuring utensil without extra air. You may then count the number of pieces that went into that measuring utensil and that becomes the number or amount to serve to credit as the intended volume.

Weight versus Volume

As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). The fact that spoodles, which are used to measure volume, are often referred to as a “4 oz. spoodle” for example, makes this somewhat confusing. A 4 oz. or ½ cup spoodle is actually 4 fl. oz. rather than 4 oz. by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas). The table below summarizes the differences between weight and volume.

	Measures	Measured In	Conversions	Tools Used
WEIGHT	Meat/meat alternates Grains	Ounces (oz) Grams (g) Kilograms (kg) Pounds (lb or #)	1 lb = 16 oz 1 oz = 28 g	Scale
VOLUME	Fruits Vegetables Milk	Fluid ounces (fl oz) Tablespoon (T or TBSP) Teaspoon (t or tsp) Cups (c) Pint (pt) Quart (qt) Gallon (gal) Liter (L)	3 tsp = 1 TBSP 16 TBSP = 1 c 1 c = 8 fl oz 1 pint = 2 c 1 quart = 2 pints 1 gallon = 4 quarts	Spoodles , measuring cups, measuring spoons, scoops, dishers, ladles

Maintaining Extra Food Onsite

Consider maintaining a small stock of shelf stable items at your school in the event that you run out of a food during service or another event prevents you from having a sufficient quantity to offer all students. In speaking with staff, running short on food does not happen at this school, but having a backup supply could prevent having to offer non-reimbursable meals due to missing components or quantity shortages.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- Meal Pattern Finding #1:** There was a missing grain component on Wednesday of the week of review with one of the entree options. A pretzel rod was planned with the Chili Cheese Baked

Potato, but was not on the production record and was not offered. This missing grain also resulted in a daily grain shortage that day during the week of review, as well as a weekly grain shortage during the week of review. Although menu planning and meal preparation is completed by another school district, it is ultimately your school's responsibility to ensure all meals offered and claimed for reimbursement meet all meal pattern requirements.

Fiscal action will be assessed on all meals missing the grain component during the week of review. Repeat violations of a grain shortage during subsequent Administrative Reviews may result in fiscal action.

Corrective Action Needed: Submit a written statement specifically explaining your plan to ensure that all meals served meet all meal pattern requirements for the K-8 grade group going forward. This process should be discussed with Appleton Area School District.

- ❑ **Meal Pattern Finding #2:** 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. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted. Recipes and crediting documentation were available onsite for the week of review and the week containing the day of review; however, documentation must be maintained onsite for all items offered as part of the National School Lunch Program

Corrective Action Needed: Submit a written statement acknowledging that you understand this requirement and that you will be requesting additional documentation from Appleton Area School District for the complete lunch cycle menu.

- ❑ **Meal Pattern Finding #3:** No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. Juice is offered daily at lunch and students are allowed to select two juices. With this practice of allowing students to select more than one juice, the weekly juice limit was exceeded during the week of review.

Corrective Action Needed: Submit a written statement explaining how many juice cartons students will be able to take going forward.

Use caution when determining if students can select duplicate juice cartons with meals. SP 10-2012, Questions and Answers on the Final Rule defines an "offering" of fruits or vegetables for the purposes of assessing the juice limit, as "the amount a child is able to select at a given meal, regardless of the number of options/variety of fruits or vegetables. The total amount of juice available at all meals over the course of the week (separately for lunch and breakfast) is then divided by this total fruit offering to determine the weekly juice offering. No more than half of the total fruit offering may be in the form of juice."

When analyzing the juice limit, consider the total amount of fruit students are able to select each day and how much juice to which they have access.

Therefore, if 1 cup of fruit is offered daily in the form of ½ cup juice and ½ cup fruit, the students have access to 2.5 cups of juice and a total of 5 cups of fruit over the week.

- 2.5 cups juice/5 cups fruit = 50 percent

In this situation, duplicates of juice are not allowed. If students are allowed to take duplicates, they have access to 1 cup of juice at breakfast each day, or 5 cups of juice over the week.

- 5 cups of juice/5 cups of fruit = 100 percent

Therefore, while students can take duplicate serving of the fruit at the discretion of the menu planner, they cannot take two juices. Use signage to communicate this to your students.

- ❑ **Meal Pattern Finding #3:** Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. Although all students observed at lunch took a reimbursable meal, it is important for staff to fully understand the OVS requirements.

Corrective Action Needed: The food service employee responsible for checking trays to determine if they contain reimbursable meals must complete the [Offer versus Serve webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html) and [Meal or No Meal webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html) and submit completion certificates.

(https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html;

https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html)

- ❑ **Meal Pattern Finding #4:** A scale should be available onsite to weigh foods as necessary. Although thorough recipes and production records with planned serving sizes are supplied by Appleton Area School District, a scale should be available in the event that the weight of an item would need to be determined.

Corrective Action Needed: Please purchase a scale to weigh foods in ounces. Submit a copy of the invoice.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

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. The [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.
- 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.
- 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Alternate meals for students without funds to pay, that are provided free of charge, must have the entire meal cost funded from a non-federal source and are subject to nonprogram foods revenue regulation as food service may not absorb the meal cost.

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

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** The district has no written unpaid meal charge policy which was required to be in place and distributed to families by July 1, 2017.
Corrective Action Needed: Submit a timeline for the development of a written unpaid meal charge policy and distribution to households.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.

- 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.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

And Justice for All Poster

- Please contact Laura Paella at laura.paella@dpi.wi.gov to mail you the latest version of the “And Justice for All” poster.

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.

Processes for complaints

- All SFAs should have procedures 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 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).
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

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. You may use the [prototype Medical Statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** SFAs does not have policy in place for handling child nutrition programs civil rights complaints in regards to discrimination in USDA programs.

Corrective Action Required: Please submit a civil rights complaint policy that includes: all verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days.

- ❑ **Finding #2:** Civil Rights training was not completed for food service volunteers.

Corrective Action Required: Please submit a sign-in roster from civil rights training for all volunteer staff.

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<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).
- 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](#) 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: Wellness Policy

- ❑ **Finding #1:** SFA LWP meets some but not all requirements as stipulated above.

Corrective Action Required: Please provide a timeline for updating the above items in your policy to become compliant with the final rule.

Smart Snacks in Schools

Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages (other than a la carte milk) sold at Riverview Evangelical Lutheran School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

Professional Standards: Training Requirements

- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- 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

Findings and Corrective Action: Professional Standards

- ❑ **Finding #1:** 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.

Water

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

- Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.
- For more information and resources on the water requirement, see our [Water Availability](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/water-availability) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/water-availability>).

Findings and Corrective Action: Water

- Finding #1:** Water is not available to students during meal service as the drinking fountain is inoperable.

Corrective Action Needed: Provide a statement of how water will be provided to all students during meal services moving forward.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety

- 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>).
- 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.

Food Employee Reporting Agreements

- Signed [employee reporting agreements](#) must be on file for all staff and volunteers operating the food service program. Employees and volunteers must sign a new Food Employee Reporting Agreement yearly (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).

Time/Temperature Control for Safety (TCS) Food

- Milk and dairy products
- Shell eggs
- Meat (beef, pork, and lamb)
- Poultry
- Fish
- Shellfish and crustaceans
- Baked potatoes
- Heat-treated plant food, such as cooked rice, beans, and vegetables
- Tofu or other soy protein
- Sprouts and seed sprouts

- Sliced melons
- Cut tomatoes
- Cut leafy greens
- Untreated garlic-and-oil mixtures
- Synthetic ingredients, such as textured soy protein in meat alternatives

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.

Findings and Corrective Action: Food Safety

- Finding #1:** Food Safety Plan does not contain site specific Standard Operating Procedures (SOPs), equipment lists, onsite staff, or all process 1, 2, 3 items and has not been updated since 2009.
Corrective Action Required: Please review your Food Safety Plan and make site-specific updates to the plan and submit when complete. An updated prototype may be found on our [Wisconsin School Food Safety](http://dpi.wi.gov/school-nutrition/food-safety#fsp) webpage (<http://dpi.wi.gov/school-nutrition/food-safety#fsp>).
- Finding #2:** Because hot items are held outside of mechanical heating and cold items are held outside of mechanical refrigeration, Time as a Public Health Control must be used.
Corrective Action Needed: Develop a Time as a Public Health Control SOP and place in school’s food safety plan. Submit updated SOPs as attachments via email.
- Finding #3:** No signed employee reporting agreements were on file.
Corrective Action Needed: Please have all food service staff and volunteers sign an employee reporting agreement and submit as an attachment via email.
Corrected onsite. No further action required

Buy American

- The USDA requires that an 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 and Buy American monitoring procedures can be found in the [Contract Management](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/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](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking 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>).
- 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. This will be treated as TA for the 2018-19 school year, but work with your distributor/supplier to move toward compliance.

Findings and Corrective Action Needed: Buy American

- ❑ **Finding #1:** The following products were identified in the storage area from which the SFA receives its food as non-domestic and not listed on the SFA's Buy American – Noncompliant List:
 - Trio Gravy – Canada
 - Frozen Peas – Canada
 - Frozen Corn – Canada
 - Bananas – Costa Rica

Corrective Action: Submit a copy of the completed noncompliant product form for each of the four items found in storage at the SFA providing meals for your school. Additionally, request a copy of all completed noncompliant product forms from Appleton Area School District. Maintain these completed forms with your product documentation going forward and request that Appleton Area School District provide you completed forms for any nondomestic products added to the lunch cycle menu.

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).