

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

School Food Authority: Rosholt School District

Agency Code: 494963

School(s) Reviewed: Rosholt Elementary

Review Date(s): 4/23/18–4/24/18

Date of Exit Conference: 4/24/18

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, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Rosholt School District for the courtesies extended during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The food service staff were friendly, accommodating, and available for questions. The SFA offers a nice variety of menu items for the students—including assorted fruits and vegetables in a variety of ways. Interactions between staff and students were positive and customer-service focused. The breakfast service model appears to be efficient and allows students to customize their breakfast bags before taking them to the classroom to enjoy.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- The determining official was available for questions and very receptive to feedback during the review. The determining official was easy to collaborate with and quickly attended to the necessary corrective actions requested. Thank you for taking time to prepare for the review in advance.

Technical Assistance:

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Income Frequency

- The determining official annualizes all incomes reported on applications, regardless of reported income frequencies. When an application has multiple income frequencies listed, the income should be annualized before a determination is made.
- On the other hand, when an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual or monthly, but instead use the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) to look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

Direct Certification

- As a reminder, it is required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run. The SFA did not complete a DC run three months after the initial run as required, however this was due to an extended absence by the determining official. The SFA understands the DC run requirements and typically runs DC more frequently under normal circumstances.

Other Source Categorical

- While the SFA currently does not have any students categorically eligible for meal benefits, it is important to note the proper procedures for these cases. If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, 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.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Benefit Issuance List

- The determining official utilizes a manual benefit issuance list in addition to Skyward. This manual list appears to be useful in keeping track of students receiving meal benefits and specific notes about the benefit determinations.
- The manual list should be updated regularly. During review of the Skyward-generated benefit issuance list and the manual list, several discrepancies were noted. It is recommended to periodically run a benefit issuance list report in Skyward and compare to the manual benefit issuance list to ensure accuracy.

Limited English Proficiency (LEP)

- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized 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) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The non-profit 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

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- 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. Source documentation means that the information originally used to determine the student's meal eligibility is shared with the school requesting the information for the new or transfer student. Source documentation may include a copy of the original application or a copy of a DC run with the student's name listed. A phone call or copy of a benefit approval letter are examples of documentation that would not be sufficient to establish the new or transfer student's eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Skyward Use

- The SFA uses Skyward for food service management tasks, however there are many features of the program that are being underutilized. It is highly recommended that staff members seek out training opportunities to expand knowledge and skill capacity for using Skyward. Additional training may improve efficiency, decrease errors, and streamline processes.

Training:

- It is recommended that the determining/verifying official consider attending relevant trainings at SNSDC during the summer. Additionally, [webcasts on a variety of topics](#) are available on the DPI SNT website (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding A:** Of the 88 eligibility determinations reviewed, 4 errors were identified. The error percentage will not result in an independent review of applications and fiscal action will not be assessed for these errors.
 1. One application containing the names of two students was incomplete due to the lack of the adult household member's social security number information.
 2. One student was receiving free benefits for the entire school year, but should have had a Paid status after the end of the 30 day carry over period. There was no supporting documentation for this student's eligibility status.
 3. One student was receiving reduced priced meals for the entire school year but should have been receiving free meals as a result of a direct certification match in August 2017. The approval of benefits letter sent to the family in August informed the family the student would receive free meals, however the benefit was incorrectly entered as Reduced in Skyward. This error resulted in a negative balance accumulation by the household.

Corrective Action Needed for Finding A: Corrective action has been taken for each error and is detailed below. Corrected on-site; no further action required.

1. The determining official must obtain the social security number information from the household and update the application accordingly to make it complete. The date of the conversation should be noted on the application and the determining official should initial the application updates.
2. The household must be sent an adverse action letter notifying them that the student is no longer eligible to receive free meals. The household must be given ten calendar days before the benefit changes to Paid, so that a hearing can be requested if desired.

3. The household must be sent a letter notifying them that the student will immediately begin receiving free meals. The letter should explain the error. Because the family was originally notified in August 2017 that the student would receive free meals, the family should be issued a refund for reimbursable meals eaten since the beginning of the school year. Student meal account information indicates that the student ate 113 reimbursable lunches and 4 reimbursable breakfasts this school year and was charged reduced prices for these meals—the family must be refunded a total of \$46.40 for these meals. This refund can be issued in a manner that reduces the family’s negative account balance. The remaining negative balance the family owes for purchases of a la carte items must be paid in accordance with the unpaid meal policy procedures.

Verification

Technical Assistance:

- Verification was not completed until February due to an extended absence experienced by the verifying official. In late January, the verifying official contacted the DPI SNT assistant director to negotiate steps to complete verification late.
- The verification process, though completed late, was completed correctly. The appropriate number of applications was selected and an additional application was verified for cause justifiably.

Findings and Corrective Action Needed: Verification

- ✓ **Finding B:** The online contract indicates that the food service director is the confirming official. However during the verification process, the elementary school principal served as the confirming official. The elementary school principal is also listed as the hearing official.

Corrective Action Needed for Finding B: Please submit the names or position titles of the confirming and hearing officials for the next school year to the consultant.

Meal Counting and Claiming

Commendations:

- The SFA utilizes a beginning-of-the-line POS for meal service. While this setup can be difficult to properly implement, the food service staff members do an excellent job correctly using this POS system. Servers at the end of the line ensure that students have reimbursable meals or that they return to the cashier to be charged a la carte prices when necessary. There were no non-reimbursable meals observed during the review—great job!

Technical Assistance:

Edit Checks

- The claim preparer currently completes a manual edit check in preparation for claim submission. Because the SFA uses Skyward, the claim preparer can use the AccuClaim report in Skyward to completely replace the manual edit check. The AccuClaim contains all required information for an edit check and should be reviewed prior to claim submission for discrepancies or potential errors.

Field Trip Meals

- It is great that field trip meals are offered to students so that they have access to an affordable, nutritious meal while on a trip. However, the point of sale procedures are not currently being met.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding C:** The current POS system for field trip meals does not meet POS requirements. Currently, student accounts are charged for field trip meals when the meals leave the kitchen for the field trip. Any students that get sick or do not eat their meal are then refunded later. This constitutes a “back out” system of counting and claiming since meals are charged to student accounts before the student takes and eats the meal.

Corrective Action Needed for Finding C: Please modify the field trip POS system so that students are checked off by the accompanying teacher as they take their meal. Completed check off sheets should be returned to food service and used for charging student accounts and claim submission. The [Field Trip meal resources](#) can be of assistance in the modification of field trip POS (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). Please submit a written plan to the consultant detailing how field trip meals will be counted and claimed going forward, including a copy of the check off sheet that will be used at the POS.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Thank you to all staff at Rosholt School District for the warm welcome and cooperation during this Administrative Review (AR). All staff were friendly and respectful to students, making for a pleasant dining experience.
- Thank you to the food service director for sending all documentation prior to the onsite review and for answering follow up questions. There have been major improvements since the last AR, conducted in SY 14-15. Great job for making changes to the breakfast and lunch menus to comply with federal regulations.
- Kudos for adding extra signage at breakfast to pull more students into the cafeteria from the hallway. Thank you for serving healthy, nutritious meals to the students of Rosholt School District!

Technical Assistance:

Training

- Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check the [training webpage](#) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). All members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (dpi.wi.gov/school-nutrition/directory).

Field Trip Meals

- Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way for collecting meal payments, and obtaining a count by eligibility category.
- If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate (M/MA), and vegetable together in a bag, then allow students to select from, or turn down, fruit choices and at a milk from at least two milk types. For more information, reference the [Meals on Field Trips](#)

overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

Production Records

- Production records are useful tools to record information prior to, during, and following production. They aid in forecasting for future meals served with specific menus. Be specific about the identity, brand, and description of the items served. Instead of “muffin,” list the specific type of muffin offered (i.e. chocolate, blueberry). Fruit sizes for oranges and apples (i.e. case count) should also be recorded.
- Production records should be updated when new products are added or replaced. There was crediting of menu items on production records during the week of review that reflected the crediting of old products. The following discrepancies were on production records: the hamburger bun credits 2.0 ounce equivalent (oz. eq.) grain, yet the crediting of 1.5 oz. eq. was recorded; the dinner roll credits 1.0 oz. eq. grain, yet the crediting of 1.25 oz. eq. was recorded; and the Chicken Patty on a Bun credits 3.0 oz. eq. grain, yet the crediting 2.5 oz. eq. grain was recorded. Be sure to update these on production records going forward.
- Planned portion sizes are required on production records for every meal component. Even in self-service set ups, the menu planner must plan a specific portion size that he or she intends students to take. This includes the vegetables or fruit on the salad bar. Although not required, it may be helpful to include not just portion size, but also crediting on the breakfast production records. This will help staff understand what students need to select for a reimbursable meal.
- Make sure all columns on production records are filled out consistently. On some days during the week of review, actual number of servings prepared were not always filled out. Continue working with staff to record information on production records thoroughly and accurately.
- A list of production record requirements (“Must Haves and Nice to Haves”) and sample production record templates can be found on the [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Standardized Recipes

- Any menu item made in-house with more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield each time when the exact procedures, equipment, and ingredients are used.
- Standardized recipes should be organized by a category or number system for easy reference. This should then be reflected on production records so staff understand which recipe to prepare. Recipes should also be updated to reflect current practices and products used. Some of the recipes provided during the week of review contained outdated information. For example, the Sloppy Joe on a Roll had crediting of 2.0 oz. eq. M/MA, yet the crediting should actually be 2.75 oz. eq. M/MA as the recipe had been updated to include more beef crumbles.
- Guidance on what a standardized recipe should include can be found on DPI’s [Recipe Resources and Tools](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Grain Crediting

- Grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) of the United States Department of Agriculture (USDA) *Food Buying Guide* (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). If a product is not listed on Exhibit A, you must obtain a signed manufacturer’s Product Formulation Statement (PFS) that lists the *grams of creditable grain* in the product.
- There are situations where a grain may be credited using Exhibit A, yet will credit more using information directly from the manufacturer’s PFS. It is recommended to use the PFS in these cases, as you may contribute more towards the meal pattern. To be able to use this highly crediting

information, obtain and keep on file an accurate PFS for the specific product. For example, the Baker Boy Cinnamon Roll Dough credits 1.25 oz. eq. using group D on Exhibit A, however credits 2.0 oz. eq. grain using the manufacturer's PFS. The Cheez-its credit 0.75 oz. eq. grain using group A on Exhibit A, however credit 1.0 oz. eq. grain using the manufacturer's PFS. The Goldfish crackers credit 0.75 oz. eq. grain using group A on Exhibit A, however credit 1.0 oz. eq. grain using the manufacturer's PFS.

Oranges, 113 count

- According to the USDA [Food Buying Guide for School Meal Programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (<http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>), one standard 113 count orange credits as $\frac{1}{2}$ cup fruit. Therefore, an orange that is cut into quarters, and three of those quarters are bagged and offered to students, will credit as 0.375 cups of fruit. This offering, along with a $\frac{1}{2}$ cup of juice at breakfast, only provides $\frac{7}{8}$ cup of fruit offered to students, which is less than the 1.0 cup of fruit required daily. This also poses an issue under OVS if, for example, a student only selected the oranges (0.375 cup), a cereal bar (1.0 oz. eq. grain), and a milk (1 cup), which does not satisfy the $\frac{1}{2}$ cup fruit and/or vegetable requirement.

Grain-based Desserts

- No more than 2.0 oz. eq. of grain-based desserts can be offered per week at lunch. Grain-based desserts that are whole grain-rich (WG-R) can count towards the grain component, but grain-based desserts that are not WG-R cannot. Grain-based desserts, whether WG-R or not, must still contribute towards the weekly grain-based dessert limit (i.e., a slice of cake made with enriched white flour only cannot credit towards the grain component, but it counts towards the grain-based dessert limit for the week).
- There was a WG-R cookie (1.0 oz. eq. grain) served at lunch on the day of review. Although the food service director planned the menu so that these were considered an extra and therefore not counting them towards a reimbursable meal, just know that because these are WG-R, they could be counted as a grain under the National School Lunch Program (NSLP) if you choose. Regardless of counting these toward the meal or as an extra, they must be counted towards the weekly grain-based dessert limit at lunch of 2.0 oz. eq. grain.

Child and Adult Care Food Program (CACFP)

- The updated CACFP meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.
- More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).
 - **Co-mingling Flexibility Misuse (Lunch)**
 - Preschool students are allowed to follow the K-12 menu at breakfast and the K-5 (or K-8) menu at lunch *if* they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA.
 - During on-site observation at lunch, preschool (pre-K) students were served the K-5 menu, but were not served at the same time and in the same place as the K-5 students. They came through the line as one class, therefore it was easy to determine which students were pre-K.
 - Children who are not yet in kindergarten must be served the CACFP meal pattern if not co-mingled with other age/grade groups. Training and additional resources can

be found on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

- **CACFP Meal Pattern**
 - Refer to the [meal pattern table](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf) to ensure all meals meet the updated CACFP meal pattern (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf).
- **CACFP, OVS**
 - Under the updated CACFP meal pattern, OVS is not an appropriate service style for pre-K students. It may interfere with the nutrition goals of the CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences.
 - Instead, pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service. For more information please visit the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).
- **CACFP, Grain-based desserts**
 - Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. These include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. Items with names such as “breakfast rounds” resemble grain-based desserts and are not a creditable grain. Homemade items and desserts made with whole grains or more nutritious ingredients like black beans, applesauce, or vegetable puree are still considered grain-based desserts and do not credit toward the grains component.
 - When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is thought of as a dessert or treat. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf).
- **CACFP, Serving a Vegetable in Place of Fruit**
 - A second vegetable may be served in place of the fruit component at lunch. The second vegetable must be at least the same serving size as the fruit component it is replacing. If two vegetables are served, they must be two different vegetables. For example, two servings of carrots would not be allowable, and a serving of sweet potato fries along with a serving of mashed potatoes would not be allowable because they are both potatoes. Since there is no vegetable subgroup requirement for the updated CACFP meal pattern, the two servings of vegetables do not need to be from different subgroups (i.e., dark green, red/orange, starchy, beans and peas (legumes), or other vegetables). For example, a lunch with a serving of carrots and a serving of red bell peppers (both red/orange vegetables) is allowable.
- **CACFP, Milk Types**
 - Under the updated CACFP meal pattern, flavored milks are not allowable. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. Discontinue serving skim chocolate milk to pre-k students. The Smarter Lunchrooms Movement has strategies to [encourage the consumption of unflavored milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

- **Contact Information**

- For questions about the updated CACFP meal pattern, please contact our DPI specialists: Tanya Kirtz at Tanya.Kirtz@dpi.wi.gov or Erin Opgenorth at Erin.Opgenorth@dpi.wi.gov.

Milk Recipe

- If it becomes too time- or labor-intensive to record milk usage by type on production records, you may consider using a milk recipe. A milk recipe is documentation of average milk usage by meal (breakfast or lunch) and grade group. When a milk recipe is on file, total milk usage must still be recorded on production records. Milk recipes must be updated twice per year or when you notice that students' preferences change.
- Instructions and a milk recipe template may be found on our [Meal Pattern Components](#) webpage, under the milk heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk>).

Vegetable Subgroups

- On production records, ½ cup green beans were recorded as ¼ cup starchy and ¼ cup red/orange. Green beans should be credited based on volume served (i.e. ½ cup by volume will credit ½ cup vegetable) and credit towards the “other” vegetable subgroup.
- Review the Connecticut Department of Education’s list of [Vegetable Subgroups](#) for vegetables and their subgroups (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ✓ **Finding D:** There was a daily fruit shortage at breakfast during the week of review on Thursday, March 16, 2018. The orange (113 ct. = ½ cup fruit) was quartered and three of those quarters (¾ cup) offered with a juice (½ cup). This equals ⅞ cup of fruit offered, which is less than the required 1.0 cup of fruit at breakfast.

Corrective Action Needed for Finding D: Submit a statement explaining what you will do to the week of review so that a full 1.0 cup of fruit is offered to students daily when the orange slices are served. The food service director will offer the entire orange (four quarters), which is ½ cup of fruit, as well as the ½ cup of juice to meet the 1.0 cup fruit requirement at breakfast. Corrected on-site; no further action required.

Repeat violations of a daily fruit shortage at breakfast during subsequent Administrative Reviews may result in fiscal action.

- **Finding E:** There were no serving sizes on the salad bar production records.

Corrective Action Needed for Finding E: Submit updated salad bar production records with serving sizes for each menu item. Although not required, DPI’s [Salad Bar Production Records](#) or [Garden Bar Production Records](#) may be used (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-production-record.doc>) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/garden-bar-production-record.doc>).

3. RESOURCE MANAGEMENT

Non-Profit School Food Service Account

Commendations:

- The bookkeeper does an excellent job managing the finances for the non-profit food service account. All questions about accounting procedures were answered quickly and with supporting documentation.

Technical Assistance:

Annual Financial Report

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for non-program food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>). See corrective action below.
- 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” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, report 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, 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.

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
- 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>).
- The unpaid meal charge policy must be distributed in writing to all households. The SFA distributed the unpaid meal charge policy to all families at the beginning of the school year in a variety of ways

for each school level. To simplify the distribution of the policy to all households, it is highly recommended to include the policy with the application information distributed in the Rosholt Record before the start of the school year.

Findings and Corrective Action Needed: Non-Profit Food Service Account

- ✓ **Finding F:** The AFR submitted for the school year 2016-17 did not have any expenditures listed for non-program foods. Additionally, the non-program food information submitted did not account for all non-program foods sold.

Corrective Action Needed for Finding F: Please resubmit your 16-17 Annual Financial Report with updated figures for revenues and expenditures for non-program foods. To do this, contact Jacquie Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update. Corrected on-site; no further action required.

Revenue from Non-Program Foods

Commendations:

- Thank you to the food service director for promptly completing corrective action on-site pertaining to non-program foods.

Technical Assistance:

- Non-program food revenue should be assessed annually to ensure compliance and determine if prices need to be increased. Please be sure to complete the non-program foods revenue tool each year.
- Non-program 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.
- It is highly recommended to begin charging labor fees for catering orders. Charging for food cost alone does not account for the labor involved in ordering, receiving, and preparing these food items. Labor should be included in the invoiced cost the food service department charges to the purchasing organization. Additionally, if napkins, utensils, or any other supplies are provided as part of the food order, these items should be costed out and included in the invoiced cost.
- See corrective action below.

Resources:

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

Findings and Corrective Action Needed: Non-Program Foods Revenue

- ✓ **Finding G** The food service director completed the USDA non-program foods revenue tool, however it did not appear to be completed correctly.

Corrective Action Needed for Finding G: During the on-site review, the food service director redid the tool and used the DPI tool for the five day reference period. Discussions with the director and review of the completed tool show that the SFA is compliant with non-program food revenue requirements. The completed tool does indicate that increasing some prices for non-program foods would be justified and recommended for the next school year. Corrected on-site; no further action required.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

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. See corrective action below.

Non-Discrimination 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. See corrective actions below.

Public Release

- The public release was distributed to the appropriate outlets and contained all required information. However, the public release used combined the CEP and non-CEP information which made for a confusing message. Please be sure to use the [public release](#) for non-CEP schools found on the DPI SNT Free/Reduced webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>).

Overt Identification

- During lunch observation, it was observed that student lunch prices were visible on the computer screen. While students could not see the display, the cashier could easily determine the benefit status of students. Discussions with the food service director determined that cashiers do not need access to students’ free/reduced information, and therefore the prices on the screen are not necessary. The director promptly adjusted the settings so that meal prices no longer show on the screen. Thank you to the director for attention and prompt action regarding this issue.

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. Be sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](#) resource.

Special Dietary Needs

- The SFA is not currently accommodating any students’ special dietary needs. However, the SFA should be aware of the updated guidance for accommodating special dietary needs. Additionally, it

is recommended that the SFA use the [prototype Medical Statement](#) for Special Dietary Needs for accommodation requests (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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. 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>)
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Findings and Corrective Action Needed: Civil Rights

- Finding H:** Civil rights training had not been completed by the administrative secretary who is the determining and verifying official.

Corrective Action Needed for Finding H: The administrative secretary must complete [civil rights training](#) and document completion (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>). Notify the consultant when the training has been completed.

- ✓ **Finding I:** The shortened non-discrimination statement on the menus is incorrect.

Corrective Action Needed for Finding I: Please update the menu template so that it contains the correct shortened non-discrimination statement. Corrected on-site; no further action required.

- Finding J:** The food service webpage does not contain the full non-discrimination statement, as is required when communicating information pertaining to child nutrition programs.

Corrective Action Needed for Finding J: Please work with the appropriate staff member to update the food service webpage so that it contains the [full non-discrimination statement](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc>). Notify the consultant when the webpage has been updated.

On-site Monitoring

Technical Assistance:

- While the SFA operates three school sites according to the online contract, all school sites are located in the same building. The food service director has direct daily oversight for both sites and therefore on-site monitoring is not required.

Local Wellness Policy (LWP)

Technical Assistance:

Wellness Policy Final Rule

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

Public Involvement

- Adding information about the wellness committee to the newsletter may be an effective way to recruit parents for involvement.
- Posting information on the food service webpage about who to contact to get involved with the wellness committee may be an effective way to recruit community members or other members of the general public for involvement.

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).

Triennial Assessment

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

Resources:

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

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding K:** The LWP does not contain the required content. The policy is outdated and is meeting very few of the content requirements.

Corrective Action Required for Finding K: Please provide a timeline for updating the policy to become compliant with the final rule. Use the resources listed to assist in creating a revised policy. The policy builder and policy checklist will be most helpful in reviving the outdated policy.

Smart Snacks in Schools

Technical Assistance:

Overview

- All foods and beverages sold to students on the school campus during the school day, outside of a reimbursable meal, must meet both the general and nutrient standards, unless the sales qualify for an exemption (i.e. fundraiser that sells non-compliant products).
- More information can be found on the [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) or in the [Smart Snacks “In a Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf).
- To determine if a product meets the general and nutrient standards, use the [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) (https://foodplanner.healthiergeneration.org/calculator/). Simply answer a series of questions, then save and print the results for your records.

Fundraisers

- There are two situations by which an organization may sell foods and beverages to students during the school day.
 1. If selling foods or beverages that **meet** the Smart Snacks standards:
 - 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 may include 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.
 2. If selling foods or beverages that **do not meet** the Smart Snacks standards.
 - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school, per school year, not to exceed 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. This is crucial to ensure each student organization holding fundraisers complies with the Smart Snacks rule. The process of tracking fundraisers simply means keeping a list of each student organization that held a fundraiser, noting the length of time and location of the fundraiser, ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. Templates, such as the Exempt Fundraiser Tracking Tool, are available 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).

Findings and Corrective Action Needed: Smart Snacks

- ❑ **Finding L:** The Student Council holds fundraisers during the school year, which sells fifty-pound bags of popcorn and icy pops. There were no labels provided nor are these food fundraisers tracked. Therefore, Smart Snack compliance cannot be assessed.

Corrective Action Needed for Finding L: Submit a statement explaining how the school will bring all food and beverage fundraisers into compliance. Include specifics on who at the school will be responsible for tracking exempt fundraisers and how documentation will be kept.

Professional Standards

Commendations:

- The food service director does a great job tracking and organizing professional standards information for the food service staff members.

Technical Assistance:

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.).
- Annual civil rights training can contribute to annual professional standards training hours. Additionally, time spent completing tasks for the administrative review, including face-to-face discussions with DPI staff during the on-site review, can contribute to professional standards training hours.
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. 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 by Position

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action Needed: Professional Standards

- Finding M:** The administrative secretary is subject to four hours of professional standards training annually based on regular job duties for the nutrition programs.

Corrective Action Required for Finding M: Please submit a professional standards training tracker for the administrative secretary that details any training completed this school year. The tracking tool should indicate the name of the employee, weekly hours spent working on food service tasks, dates of trainings, topics of trainings, who sponsored the training, and the length of the training.

Food Safety

Commendations:

- The kitchen was kept clean and food service staff were observed using good food safety practices. The food safety plan has clearly been reviewed by the food service director and appears to be utilized as a reference, as is the intention of the plan.

Technical Assistance:

- Storage areas were inspected as part of the on-site review. During inspection of the freezer, it was observed that many boxes were stored on the floor. This issue and solutions were discussed with the food service director. It was noted that a change in shelving will be implemented during the summer that will assist in improved freezer space utilization to prevent items from being stored on the floor.

Buy American

Technical Assistance:

- 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 and farmers, and may provide healthy choices for children participating in USDA School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- Labels should indicate if the product is grown, processed, and packaged in the continental United States (U.S.) or any U.S. Territory. If the label indicates the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires more information from the manufacturer.
- Information on this new requirement, including a tool to assist with tracking noncompliant 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>).

Findings and Corrective Action Needed: Buy American

- ✓ **Finding N:** The following products were identified as non-domestic and not listed on the SFA's Buy American – Noncompliant List:
 - Pineapple Tidbits, canned (Indonesia)
 - Tropical Fruit Salad, canned (Thailand)
 - Cucumbers (Mexico)

Corrective Action Needed for Finding N: Complete and submit [Non-Compliant Product Forms](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) for the products listed above (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>). Corrected on-site; no further action required.

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

Technical Assistance:

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 Rosholt 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 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

- To access an inclusive map of all potential participating sites in the 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

Findings and Corrective Action Needed: SFSP and SBP Outreach

□ **Finding O:** The SFA did not notify families of the availability of summer feeding programs in the surrounding area.

Corrective Action Needed for Finding O: Please provide a statement describing how the SFA will notify district families of summer feeding program availability for the upcoming summer.

5. OTHER PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations:

- The WSDMP appears to be operating smoothly and in compliance with all program regulations. The food service director does an excellent job preventing overt identification of students receiving free milk and retains all documentation. The claim appears accurate and the cost per pint of milk is correctly calculated as a weighted average.

Findings and Corrective Action: Wisconsin School Day Milk Program

- ✓ **Finding P:** The WSDMP agreement on file with DPI is from 1991 and must be updated to reflect current practices for this program.

Corrective Action Required for Finding P: Complete a new agreement and submit to consultant for that signature by the SNT director can be obtained. Corrected on-site; no further action required.

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

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

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage (dpi.wi.gov/statesupt/agenda-2017).



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