

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

School Food Authority: Milton School District

Agency Code: 53-3612

School(s) Reviewed: East Elementary School and Milton Middle School

Review Date(s): 2/26/18-2/27/18

Date of Exit Conference: 2/27/18

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:

GOALS

- 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).

SOCIAL MEDIA

- Submit photos to the School Nutrition Team to be posted on the DPI SNT Facebook page, Twitter page or Instagram page. Send photos to Dana Colla at dana.colla@dpi.wi.gov.

SNSDC TRAININGS

- The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer in Green Bay, Wausau, Rice Lake, Madison and Milwaukee. There will be emails sent in the coming months regarding the trainings available at these locations. You may also check back on the [School Nutrition Team training](http://dpi.wi.gov/school-nutrition/training) webpage (<https://dpi.wi.gov/school-nutrition/training>).

Appreciation/Commendations:

Thank you to the Food Service Director, Determining Official, Food Service Staff, Secretaries and District Staff for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. 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.

Thank you for all that you do to feed the students healthy meals! You are much appreciated!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Applications were determined in a timely manner. Each application was signed off on and dated by the Determining Official. The official's organization of the requested benefits information made applications easy to review.
- All DPI template letters are being used for Notification/Denial of Benefits as well as the Direct Certification notification letter.
- Direct Certification is run early and often which is a best practice. Great work!

Technical Assistance/Compliance Reminders

- 366 eligibility determinations were reviewed; 5 errors were identified that will not result in Fiscal Action being taken.

Disclosure

- For any staff that has access to students' eligibility status that isn't within the School Nutrition Office (i.e. IT Department, Principals, Secretaries) they must sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This is to protect the students from any overt identification. 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>).

Transferring Students

- If a student had a free or reduced price meal eligibility at his/her prior school district, the school can provide a copy to the district the student is transferring in to.
- The start date of eligibility is the date the Determining Official reviews and determines the application, signing and dating it.
- For students transferring into the district from a different school district who had a free or reduced meal eligibility status from Direct Certification, you must obtain a copy of the original Direct Certification match file with the student's name listed to allow the student to have that eligibility status. A letter from the prior district is not enough and you must have the original supporting documentation to support this eligibility status.

Transfer Students from CEP Schools

- If a CEP student transfers to a Non-CEP school in another district, the new school must process a household meal application within 30 operating days. Until July 1, 2019 when this regulation becomes mandatory, we **encourage** the new school to provide free meals and can claim for free meals through the 30th operating day (**or until a new eligibility determination is made, whichever comes first**). In this case, acceptable documentation of eligibility from the former Provision (CEP or P2) LEA can be a copy of the [School Year 2017-18 Wisconsin Schools and Districts Participating in Community Eligibility Provision list](#) highlighting the former school's name (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/cep-notification-report.xlsx>). This list is updated annually and is available on the DPI CEP website. The prior school district should include this list in the transferring student's file.

- A [transfer student flow chart](#) and [template letter](#) can be found on the CEP SNT website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

Annualizing Income

- For household applications that list the same pay frequency (i.e. all income listed as bi-weekly), it is not necessary to annualize the income.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nsfp-public-release-1718.doc>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to a minimum of 3 places:
 - Local news media
 - Grassroots organizations (food pantry, library, grocery store, WIC clinic, laundromat)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- ❑ SFAs are not required to pay to have the public release published but may ask to have it published as a public service. The SFA must maintain documentation of whom it was sent to along with the specific materials distributed.

Findings and Corrective Action Needed

- ❑ **Finding #1:** One application is missing the adult signature.

Corrective Action Needed: Contact the household and have the adult sign the application. **Submit a copy to the consultant.**

- ❑ **Finding #2:** One application is missing the household size.

Corrective Action Needed: Contact the household and complete the household size box on the application. **Submit a copy to the consultant.**

- ❑ **Finding #3:** Three students are listed as having Free meal benefits starting in 2014, 2015, or 2016. There was no documentation on file to support this eligibility status.

Corrective Action Needed: Notify the households, whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **Submit a copy of the letter sent to each household.**

- ❑ **Finding #4:** One student is listed as having a Reduced eligible status as of 8/15/16, who should have been changed to Paid status at Carryover in October 2017.

Corrective Action Needed: Notify the households, whose benefits will be decreased from reduced to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **Submit a copy of the letter sent to each household.**

- ❑ **Finding #5:** One student is listed as having a Free eligible status as of 7/20/17, with no documentation on file to support the status. The student was found as Directly Certified Medicaid Reduced in January, and then Directly Certified Medicaid Free in March.

Corrective Action Needed: Since the student was matched on Direct Certification as Medicaid Free, no further action required.

Verification

Commendations

- Verification was well done and completed in a timely manner, prior to the November 15 deadline.
- The Verifying Official is very organized. Three applications were verified.
- A confirmation review took place and the Confirming Official signed off on this task.
- The DPI Verification tracker sheet and all DPI notification letters and templates were used for Verification. All forms were thoroughly completed and very organized.
- The Verification Collection Report was completed prior to the February 1 deadline. Great work!

Technical Assistance

- When completing the Verification Collection Report, be sure to record the number of applications on file as of October 1.

Meal Counting and Claiming

Commendations

- The Breakfast and Lunch claims for January were done correctly with no errors.

Technical Assistance

- When recording the number of free or reduced students for the monthly claim for each school, use the Accuclaim and take the highest number of free and reduced students for the entire month.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

Commendations

Thank you to the food service staff at Milton School District for your warm welcome and cooperation during the Administrative Review. A special thanks to the FSD who was readily available to us for questions during our visit. We were greatly impressed with the food service department, especially the organization of documentation (e.g. Buy American Non-Compliant List), excellent understanding of Offer vs Serve, and staff actively engaging with students and encouraging them to try vegetables. Thank you for your dedication to the health and well-being of your students!

Comments/Technical Assistance/Compliance Reminders

Breakfast

It is great to see that both East Elementary and Milton Middle School offer the School Breakfast Program. However, both schools use the traditional breakfast service model and have noted that their participation rates are not very high. Milton School District and staff may want to consider a change in breakfast model to increase participation.

Breakfast in the classroom is associated with the highest participation rates, which can be as high as 98 percent of the school's enrollment, and works best in elementary schools. Other service methods, such as Grab 'n Go and breakfast after first period, correlate with increases as much as 15-40 percent of current participation. If breakfast is offered in a convenient way for students, they will participate in the program. Spend the time to observe where the students socialize and at what time. Staff at the Middle School mentioned that students prefer to socialize in the gym before school rather than go to the cafeteria to eat breakfast. Milton Middle school may consider offering some Grab 'N Go options in or near the gymnasium so that a reimbursable breakfast is convenient for those students. Or perhaps offering Grab 'N Go options in hallways for 1st period or as a later morning option to capture more students. Additionally, greater participation equates to more students being ready to learn, as well as higher levels of government reimbursement, which results in more revenue for the school.

Refer to the [Serving Up a Successful School Breakfast Program](#) guide for an in-depth look at the various School Breakfast service models to determine which one(s) may work in your schools. Find additional information on breakfast, including meal pattern and menu planning tools, on the [School Breakfast Program](#) webpage (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

Printed Menu

Monthly Menus

The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the breakfast or lunch menus. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal.

Breakfast Reimbursable Meal Signage (Milton Middle School)

Reviewers would like staff to reword the current breakfast signage. For the breakfast meal pattern, milk, grains and fruit are required components to offer, and students have the choice to select any 3 items (including a 1/2 cup fruit and/or vegetable) to create their reimbursable meal. The way the sign is worded, every student must take at least 2 oz eq grains as part of their reimbursable meal. However, this is not necessary. In this way, a reimbursable meal could be a milk, a juice and a fruit, or a milk, a 1 oz eq grain and a juice, or a fruit and a 2 oz eq grain. All these reimbursable meal options contain at least 3 items, one of which is a 1/2 cup fruit and/or vegetable.

Suggested rewording of breakfast reimbursable meal signage:

Build a complete meal by selecting at least 3 items, including 1/2 cup fruit/vegetable or combination.

Choose at least 3 items:

- juice (limit 1)
- fruit (can take 2)
- 1 oz whole grain product (pink)

- 1 oz protein (yellow)
- 2 oz whole grain product (green) (take 1 - counts as 2 items)
- Milk

Note: you may also wish to add a maximum to the amount of items a student can take.

Non-discrimination statement (Milton Middle School)

The USDA non-discrimination statement must be used on all communications with the public. Please add the following statement to Milton Middle School breakfast signage (in the cafeteria): This institution is an equal opportunity provider.

Production Records - Substitutions

If you write in substitutions or additions, be sure to write in the serving size. (e.g., the production record from East Elementary (1/24) the applesauce, peaches, and fruit cocktail were lacking portion sizes).

Crediting

Production Records

On the K-8 production records 1 vegetable, 1 fruit, 1 meat/meat alternate and 1 grain is not acceptable crediting. Grains and meat/meat alternates are credited using ounce equivalents and fruits and vegetables are credited in quarter cup (1/4 cup) increments, and must be listed as such on production records. In addition, you can add the vegetable subgroup that it pertains to. In this way, if a substitution is necessary, staff can know from which vegetable subgroup to pull from, to ensure that daily and weekly vegetable requirements are still met.

Product Formulation Statements (PFS)

Acceptable crediting documentation was not available for the BeneFIT bars. A complete **PFS** must be directly from the manufacturer and must 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. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).

Standardized Recipes

Recipes should be updated to reflect current practices and products. Grab N'Go Sliced Meat Sandwich recipes need to be updated as the hamburger bun is used instead of the whole grain hoagie bun. In addition, those recipes need to be at each school site where they might be preparing them. This is essential to maintain accuracy in food preparation if a substitute food service worker were to step in and need to make the school meals. Please keep a copy of the Sliced Meat Sandwich recipe at Milton Middle School.

Grab 'N Go Line at Middle School (Lunch)

Mainline vegetables are available to students who choose to create a reimbursable meal with the Grab 'N Go line, however, due to lack of signage, many students may not be aware of taking advantage of this. Please create and display signage that explains to students what is available to them in their Grab 'N Go reimbursable meal.

Findings and Corrective Action Needed:

- ❑ **Finding #1:** Milton Middle School breakfast signage in the cafeteria was lacking the shortened version of the USDA non-discrimination statement.

Corrective Action Needed: Provide a copy or digital picture of the new breakfast signage with the USDA non-discrimination statement.

- ❑ **Finding #2:** Milton Middle School breakfast signage requires rewording to clarify student choice under Offer vs Serve.

Corrective Action Needed: Provide a copy or digital picture of the new breakfast signage with new wording.

- ❑ **Finding #3:** Breakfast and lunch monthly menus do not list milk choice.

Corrective Action Needed: Add milk choice to the monthly menus, either daily or a statement somewhere on the page that says a variety of milk is offered daily. Submit a copy or digital picture of the new signage.

- ❑ **Finding #4:** Unacceptable crediting documentation for BeneFIT bars - was lacking an original signature from the manufacturer.

Corrective Action Needed: Submit a copy of an acceptable PFS for the BeneFIT bars. *Completed onsite. No further action required.*

- ❑ **Finding #5:** Grab N'Go Sliced Meat Sandwich recipes need to be updated as the hamburger bun is used instead of the whole grain hoagie bun.

Corrective Action Needed: Submit updated recipes. *Completed onsite. No further action required.*

3. RESOURCE MANAGEMENT

Commendations

PLE Tool

- SFA is running the PLE tool correctly and adhering to the required lunch price increases every year, increasing student lunch prices by the necessary 10 cent weighted average increase.

Technical Assistance/Compliance Reminders

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>).

- The SFA currently has a written unpaid meal charge policy in place which is adequately distributed to households.
- Consider creating a less strict policy for the elementary students than the middle school/high school students.

Allowable Costs

- 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, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) may be found on the Financial Management webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>). A best practice is to continue to collect on the unpaid meal charges as long as you are able to and the student is still enrolled. If unable to collect, then a transfer is required to Fund 50 from Fund 10 or another non-federal fund.
- Per question 15 of the [Financial Q&A](#), student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50. Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50.

Refunds of Student Meal Accounts

- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Revenue from Nonprogram Foods

Commendations/Comments

- Using the Child Nutrition Program Report from the 16-17 SY and the below USDA Nonprogram Food Revenue Tool, the SFA is in compliance with the Nonprogram Food Revenue regulation.

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at the school district include: Adult Meals, Extra Entrees, Extra Milk, A la Carte, and Caterings.
 - The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#), located on the SNT website, feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

- The [Menu Raw Food Costing Tool](#) is an excellent tool to cost out your reimbursable meals and extra entrees (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw-food-costing-tool.xls>). It is also helpful in completing the [DPI Nonprogram Food Price Calculator Tool](#) which will also calculate the USDA Non Program Food Revenue calculation for you automatically.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed for all food service staff involved with the School Nutrition Programs. The PI 1441 form was completed correctly and prior to the October 31 deadline.

Technical Assistance/Compliance Reminders

Civil Rights Training

- Annually, civil rights training must be completed for all staff involved in the school nutrition programs. This includes non-nutrition staff members that may handle the administrative side of the programs or have access to Free and Reduced eligibility status.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong. 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.
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage.
- 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.
- “Peanut Free”, “Allergen Free”, and “Dairy Free” labeled tables are discouraged from use. Consider using “Peanut Aware” and “Dairy Aware” labels instead as you cannot guarantee the tables are free of peanuts or other allergens.
- It is not advisable to allow parents to bring in food/beverages to store in the kitchen. There are food safety concerns with this, because you do not know where the milk has been or if it has been stored at the correct temperature. Even with shelf-stable foods/beverages, there is a chance that

something may have been tampered with or may have been made unsafe before it reaches your kitchen. If the student got sick from an item brought in from home, the school may still be held liable since it was stored in your kitchen. You may find it helpful to create a written policy on this to refer to in future situations.

- The SFA does not have to buy the specific brand written on the medical statement if it is cost-prohibitive or difficult to procure. A similar product of a different brand is fine.

Local Wellness Policy

Commendations

The SFA does have a Wellness Policy in place provided by NEOLA. Thank you for having a wellness policy on file and working to assure students are on the path for a healthy lifestyle.

Technical Assistance: Local 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. 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).

SFA is required to complete an assessment of the LWP:

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](https://dpi.wi.gov/school-nutrition/wellness-policy) webpage (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy](http://www.fns.usda.gov/tn/implementation-tools-and-resources) webpage (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](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.

SFA required to inform the public of the results of the most recent assessment:

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA 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.

DPI's Team Nutrition has developed a toolkit and other resources to assist schools with building their [wellness policy](#). Schools can choose from several standardized language options in the toolkit that comply with USDA's regulations and tailor it to their school needs.

Findings and Corrective Action Needed: Local Wellness Policy

- Finding #1:** The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](#). **Provide a timeline of when you plan to have the policy updated and compliant with the final rule.** The [Wellness Policy Builder](#) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy.

- Finding #2:** The most updated And Justice for All poster was not posted in East Elementary or the Middle School.

Corrective Action Required: Post the provided And Justice for All poster and submit a statement this has been done.

- Finding #3:** Overt Identification was apparent on the POS computer screen at East Elementary while observing meal service. The screen showed prices for a free, reduced, and paid lunch.

Corrective Action Required: Remove prices for all student meal prices from POS screens SFA-wide for each food service employee with cashier permissions. **Submit a statement this has been done.**

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

Milton Middle School

The student council holds fundraisers that sell non-compliant food items to students before the school day. Under the Smart Snacks standards, the school day is defined as the midnight before to 30 minutes after the end of the instructional day. Any food available for sale to students and meant for consumption during that time frame must comply with the [Smart Snacks](#) requirements.

An organization may sell foods and beverages to students during the school day by two situations:

1. If they are 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](https://foodplanner.healthiergeneration.org/calculator/) (<https://foodplanner.healthiergeneration.org/calculator/>).
2. If they are 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 student group per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
 - b. Exempt fundraisers **cannot** occur in the meal service area during meal times.

Someone in the school must keep track of the exempt fundraisers. This does not need to be the Food Service Director. This may be decided locally and could be a principal, teacher or secretary. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

To verify foods sold to students meet Smart Snacks requirements, we recommend using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](#), found on the Smart Snacks webpage. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>)

Whenever possible, the district is strongly encouraged to help student organizations find ways to fundraise that promote a healthy lifestyle. More information on healthy fundraisers can be found on our [Smart Snacks](#) webpage, under the Fundraiser Resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Findings and Corrective Action Needed: Smart Snacks

- Finding:** Milton Middle School Fundraisers are being held before school and foods sold to students are not checked for Smart Snacks compliance, nor are they being tracked.

Corrective Action Needed: A written 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

Comments/Commendations

The Food Service Director is doing a good job making sure staff are getting their required training hours throughout the school year, that pertain to their job duties. The Food Service Director attends SNSDC classes to stay up to date on the regulations. Nice work!

Technical Assistance

Training Requirements

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

Annual Training Requirements for All Staff

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

Findings and Corrective Action

- ❑ **Finding #1:** Training is not being monitored on a tracking tool. Clearly document all training information, 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).

Corrective Action Needed: Include all current training hours for each food service employee onto the [DPI tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls) or create your own on a Google Sheet (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>). **Submit a copy of the tracking tool with trainings entered.**

Buy American

Technical Assistance

The FSD is doing an excellent job of recording the various products that are non-compliant with the Buy American Provision. A few additional products, listed below, were found in dry storage and should be added to the list.

- Canned peaches in extra light syrup - China
- Gran Sazon refried beans - no country of origin was listed
- Canned pumpkin - no country of origin was listed

Note: even though the product does not list a country of origin, it cannot be assumed that it is domestic. Inquire with the manufacturer to verify the country of origin and keep that documentation on file. In addition, please add another column to your tracking spreadsheet for Country of Origin.

Food Safety and Storage

Commendations

- It was evident during meal observation that staff members are well-trained on food safety procedures and effectively implement the food safety plan.
- A site-specific food safety plan was available at the reviewed school. It was clear that the plans are reviewed and updated regularly.
- Temperature records were well-kept, detailed, and available at the reviewed site.
- The food safety plan contained all required documentation including the equipment list, a list of the process 1, 2, and 3 foods, and site specific standard operating procedures.

Findings and Corrective Action

- Finding #1:** The most recent Food Safety Inspection was not posted at East Elementary School or Milton Middle School.

Corrective Action Needed: Post the most recent Food Safety Inspection on a bulletin board in the hallway or in the cafeteria on the window facing out into the hallway outside of the cafeteria for the public to view. **Submit a statement in writing this has been completed.**

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All documents pertaining to the School Nutrition Programs must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain. In other words, keep all documents for 3 years plus the current school year.

School Breakfast Program (SBP)

Commendations

- At the beginning of the school year, the SFA notifies families of the availability of breakfast through the public release, posting menus and through the student handbook.

Summer Food Service Program (SFSP) Outreach

Commendations

Milton School District sends a letter out to households in May letting them know of phone numbers to call or text to find open sites operating the Summer Food Service Program. They also supply the link to

the map on the Community Nutrition Team website that shows all sites participating in the SFSP. Well done!

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program

Commendations

- The claim for the 2016-17 school year was correctly consolidated and claimed for.

Findings and Corrective Action

- Finding #1:** The WSDMP contract on file is outdated.
Corrective Action: Complete a new [WSDMP contract](#) and send to the consultant for review.
- Finding #2:** The students are not being marked off as they take a milk. Teachers need to use a roster check off sheet and check off students as they take a milk to ensure the correct number of milk served are counted and claimed. This is also to be sure that the correct student is charged for a milk. Then they can enter the milk taken for WSDMP into the software system.
Corrective Action: Submit a statement in writing as to how the teachers will be handling the Point of Sale for WSDMP.

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

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

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



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