

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

School Food Authority: Hudson School District

Agency Code: 55-2611

School(s) Reviewed: Hudson Middle School & Rock Elementary

Review Date(s): March 4-8, 2019

Date of Exit Conference: 3/8/19

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Hudson School District for the courtesies extended to us during the on-site review and being available to answer questions and provide additional information. Everyone was very friendly, helpful, and receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions in SNACS as well as pulling records for the on-site portion of the review.

Thank you to the Food Service Director, Nutrition Services Program Supervisor, Purchasing Manager, Chief Financial Officer, and all food service staff for taking time out of their day to answer questions posed by the DPI review team. The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet School Nutrition Program regulations.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

The total number of eligibility determinations reviewed was 380. Of those determinations, there were 9 errors.

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- The Determining Official must sign and date each application once the application has been determined as free, reduced, or denied.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

Carryover

Carryover of meal benefits from the prior school year is allowable until the 30th operating day in the school year unless a Free and Reduced Meal Application has been submitted (approved or denied) or the student was coded on Direct Certification for any code except an N code. In those cases, carryover stops when a new meal determination has been made.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available.
- SFAs must annually distribute the Public Release to *three* of the following places:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need such as laundromats, social service agencies, libraries, grocery stores, WIC offices, food pantries, senior centers, physician offices/clinics, Community Action Program Agencies)
 - 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 must maintain documentation of whom it was sent to along with the specific materials distributed. You may request the public release to be published as a public service.

Direct Certification

- As a reminder, you are required to run direct certification with the full enrollment for the entire School Food Authority (SFA) a minimum of four times a year: at or near the beginning of the school year, three months after the initial run, six months after the initial run, and in March.
- A best practice is to run Direct Certification monthly and when a new student transfers into the district.
- The effective eligibility date for a DC eligible student is the date of the original output file of the day that Direct Certification was completed.

Transferring Students

- When a child transfers in to the school midyear, the Determining Official (DO) can request documentation to support the child's benefit status from the former school or the household can provide it.
- Appropriate documentation would be a copy of the approved application or a copy of the Direct Certification output match file which shows the DC code he/she matched to.
- If you receive a copy of the approved application determined at the prior school, the Determining Official must re-determine the application, sign, and date it. A notification of eligibility letter must go out to the household notifying the benefit and start date of eligibility.
- The start date of eligibility is the date the DO re-determined the application.

Disclosure and Sharing Free/Reduced Eligibility Information

- 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>).
- The household can "self-disclose" by bringing in a copy of their free/reduced approval notice or direct certification approval letter to the designated official operating the outside program. This option removes food service from these types of requests and is preferred. DPI recommends limiting the number of staff members responsible for collecting this data (e.g., one school secretary who has been trained on confidentiality, rather than each athletic coach).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding 1:** The Public Release was not posted prior to the start of the school year. Instead, the entire application packet was posted.

Corrective Action Required: Submit a copy of the public release that should have been posted for the 18-19 SY and a statement of how you will make sure to post the correct document for the succeeding school years.

- ❑ **Finding 2:** The complete USDA Non-discrimination statement was formatted incorrectly on the Approval/Denial letter and the DC Notification letter.

Corrective Action Required: Update both letters in the software system so the [USDA non-discrimination statement](#) is in the same size and same font as the rest of the document. Keep the same formatting as shown. Submit copies, of both updated letters, to the consultant.

- ❑ **Finding #3:** Two students were receiving reduced meal benefits. Due to an error when determining the application, the application should have been approved for free meal benefits.

Corrective Action Needed: Notify the household, whose benefits will be increased immediately. Be sure to change the students' eligibility in the system immediately as well. **No further action required.**

- ❑ **Finding #4:** Three students from different households were receiving free meal benefits with no documentation on file to support the 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. **No further action required.**

- ❑ **Finding #5:** Two students were receiving free meal benefits due to an error when determining the application. The application should have been denied due to too high of income reported.

Corrective Action Needed: Notify the household, 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. **No further action required.**

- ❑ **Finding #6:** Two students were receiving reduced meal benefits with no application on file to support this status.

Corrective Action Needed: Notify the household, 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. **No further action required.**

- ❑ **Finding #7:** While observing meal service and talking with food service staff, it is apparent that staff members in the district have access to know which students are free or reduced-price eligible. This is confidential information and should only be available to the Food Service Director, the Determining Official, and the person(s) responsible for entering WISEdata or reporting for state and federal programs. Refer to the [Eligibility Manual](#) on pages 83-91 for more information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Corrective Action Needed: Work with the IT department, administration, and your software vendors to conduct a thorough examination of the student information software and food service software to find out who has access to individual student meal eligibility data (specifically which students are free or

reduced eligible). Provide access to this information only to those with specific job duties requiring them to know individual meal eligibility status. Additionally, anyone outside of the Food Service Department with access to individual student eligibility status should sign off on the [Disclosure Agreement](#) to prevent disclosure of this information and bring awareness for the consequences of sharing that information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement-school-staff.docx>). **Submit a statement to the consultant of how you will ensure the individual student eligibility information is only accessible to those that need to perform their specific job duties.**

Verification

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

- Verification was completed correctly. Two applications were verified prior to the November 15 deadline. All DPI tracking and letter templates were used.
- The [Verification documents](#) such as the tracker form, letter templates on our website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>)
- For more information about Verification, please review the [Verification webinar](#) (https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html).
- The Verification Collection Report (VCR) was completed incorrectly, but amended on-site. Technical assistance was provided on site regarding how to complete the VCR.
- For future reference, here are the [instructions](#) on how to complete the VCR (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/verification-report-instructions.pdf>).
- The Confirming Official and Verifying Official did not sign off on the applications chosen for Verification. All applications chosen for Verification must be reviewed and signed off on by the Confirming Official. Upon completion of Verification, the application(s) must be signed off on by the Verifying Official.

Meal Counting and Claiming

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

- No errors were found on the monthly claim for reimbursement of the NSLP or SBP.
- When observing lunch service at Hudson Middle School, it was apparent that students purchase an abundance of a la carte foods and beverages rather than a reimbursable meal. While this is allowable, it causes a decrease in reimbursement for Food Service, specifically Fund 50. With each reimbursable meal, the district receives federal reimbursement, state aid, and money for USDA foods. When students purchase a la carte items, the district is losing reimbursement and money to purchase USDA foods.
- Meal service at Hudson Middle School was extremely chaotic and congested. Allowing students to purchase a la carte items with their reimbursable meals was burdensome on the cashiers. Students try to move through the cash out lines as quick as possible, which makes it stressful on food service employees to ensure they are checking trays for reimbursable meals as well as charging the students for any additional items outside of the reimbursable meal. Cashiers had to continuously put their arm out to stop students from leaving the end of the line prior to the cashier checking and charging for everything on their tray. Additionally, a student was caught trying to steal a canned beverage. To decrease congestion and chaos, consider staggering the times when students are allowed to go through the line. Another suggestion would be to limit when the students can purchase a la carte items.
- Since the students have thirty minutes to eat lunch, my advice would be to limit students to purchase a la carte items (packaged items) when there are ten to fifteen minutes left in the lunch hour. That way,

you can let them go through the line first, possibly increasing reimbursable meals (especially with staff prompting them to take a half cup fruit or vegetable) and cutting down on the stress of the cashiers checking student trays or watching for students attempting to steal.

Visiting Students

- School age students visiting for lunch, may take a reimbursable meal, be charged the student lunch price, and be claimed in the paid category. Keep documentation to support they took a reimbursable meal.
- If you prefer to charge the visiting student for the meal and not claim them, they do not have to take a reimbursable meal, but must be charged the adult meal price or at least charged enough to cover all costs for their items.

Findings and Corrective Action Needed: Meal Counting and Claiming

Finding 1: Field trip meals are not being checked off as the student takes the meal.

Corrective Action Required: Update procedures for the teachers distributing field trip meals. Have the teachers use a roster checklist and check off students as they take a reimbursable meal. The teacher should send a copy of the roster checklist back to the food service department to be entered into the software system. **Submit a statement of what the new procedure will be to track and enter field trip meals.**

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the nutrition director, food and nutrition supervisor, chief financial and operations officer, and school nutrition professionals of Hudson School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. Through discussion with school nutrition professionals at Hudson Middle School and Rock Elementary, program strengths and weaknesses were identified. School nutrition professionals and reviewers collaborated to develop strategies to improve flow through the meal service areas and to increase the numbers of students who select reimbursable meals. School nutrition professionals and district personnel answered questions honestly and demonstrated willingness to listen and to make changes. School nutrition professionals looked sharp in their uniforms, and everyone was welcoming and kind. The meal service line at Rock Elementary was colorful and clean!

Technical Assistance and Program Requirement Reminders

Non-Reimbursable Meals

Ten students at Hudson Middle School selected non-reimbursable meals during lunch meal observation on Tuesday, March 5. Students left the point of service (POS) with insufficient fruits and/or vegetables to meet the 1/2 cup requirement, while others selected only two full components. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

During breakfast and lunch meal services, students were not sent back for additional fruits and/or vegetables to meet the 1/2 cup requirement unless they were identified at the POS as qualifying for free or reduced-price meals. Instead, the majority of foods and beverages were charged a la carte. School

nutrition professionals will benefit from additional Offer versus Serve (OVS) training, to build confidence in identifying reimbursable meals and sending students back, as appropriate, regardless of eligibility status.

Furthermore, numerous entrees, snacks, sides, and beverages are sold a la carte (i.e. not parts of reimbursable meals) for the duration of lunch meal service. Students' trays were piled high with these foods and beverages, making it extremely difficult for school nutrition professionals to accurately identify reimbursable meals and charge a la carte foods and beverages. Each POS has two tray slides and two keypads; students attempted to leave the POS so quickly that school nutrition professionals frequently needed to put an arm out to stop students from leaving or to call students back to the POS to complete sales.

The Nutrition Program Consultant (NPC) and Public Health Nutritionist (PHN) strongly recommend limiting sales of a la carte entrees, snacks, sides, and beverages to the end of lunch meal services. In combination with better understanding and implementation of OVS, this may increase participation in the National School Lunch Program (NSLP) and may increase reimbursements.

Adequate signage helps students accurately select reimbursable meals by indicating how many items at breakfast or components at lunch must be taken to constitute a reimbursable meal.

Two students at Rock Elementary School selected non-reimbursable meals during lunch meal observation on Wednesday, March 6. Students left the POS with insufficient fruits and/or vegetables to meet the 1/2 cup requirement, while others selected only two full components. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

Crediting Documentation

Processed foods that are not listed in the USDA *Food Buying Guide* for Child Nutrition Programs (FBG) must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. Secure a PFS directly from the manufacturer or save a CN label directly off the packaging.

A complete PFS 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. Documentation should be printed on company letterhead and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson).

Food manufacturers periodically reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. If a processed item does not have a valid CN label or PFS and cannot be found in the FBG, it may not be credited when served as part of the USDA School Meal Programs.

Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

Crediting information recorded on the standardized recipes and the production records was not consistently in agreement with crediting information on the supporting documentation, such as CN labels, PFS, or the Food Buying Guide.

Watermarked CN Labels

A CN label with a watermark is used when the CN logo and contribution statement are used on product information other than the actual product carton and is presented as a separate document.

Manufacturers may provide schools with a CN label with a watermark during the bidding process or on their websites. Original CN labels on product cartons will not have a watermark. Product information on the CN label with a watermark can be changed. CN labels must be verified and collected from boxes as products are delivered. Once labels have been collected, check when new shipments arrive to determine if crediting towards the meal pattern has changed.

Pepperoni

Per USDA memorandum TA 05-2011, dried pepperoni may credit when used as a topping on CN labeled pizza. As Hormel pepperoni does not have a CN label, the pepperoni may not credit towards daily and weekly meal pattern requirements.

Fruits and Vegetables

Most fruits and vegetables credit by volume served (e.g. 1/2 cup peaches, drained will credit 1/2 cup fruit) and the FBG will note if the crediting is different based on volume served (e.g. one medium banana credits 1/2 cup fruit). Reference the School Nutrition Team (SNT) [Half-Cup Crediting of Fruits and Vegetables Handout](#) for amounts required to credit as 1/2 cup as well as suggested serving sizes (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>). If the product is not listed in the FBG, additional crediting documentation is required.

Consider adding signage to the meal service lines, like the SNT [Salad Bar Signage](#), showing students how many pieces of fruits and/or vegetables to select based on the planned portion size(s) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

Raw, uncooked leafy greens credit for half the volume served in their fresh forms. For example, 1/2 cup of romaine lettuce credits as 1/4 cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces, even if they are not in the dark green subgroup. If leafy greens are cooked, such as steamed spinach, then they credit as the actual volume served.

Consider placing a “last chance” bowl at the POS with pre-packaged or whole fruits and/or vegetables in at least 1/2 cup servings for students to select. Options may include pre-packaged dried cranberries or raisins, whole oranges or bananas, applesauce or mixed fruit cups, and pre-packaged carrots or celery sticks.

As a reminder, no more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. Total volume of pureed fruit, such as Strawberry Smoothie, must be counted as juice towards daily and weekly fruit requirements. It is possible to offer juice daily and still meet the 50 percent juice limit as long as it is offered along with fruit (fresh, frozen, dried, or canned). Use caution when determining if students can select duplicate juice cups with meals. SP 10-2012, Questions and Answers on the Final Rule defines an “offering” of fruits or vegetables for the purposes of assessing the juice limit, as “the amount a child is able to select at a given meal, regardless of the number of options/variety of fruits or vegetables. The total amount of juice available at all meals over the course of the week (separately for lunch and breakfast) is then divided by this total fruit offering to determine the weekly juice offering. No more than half of the total fruit offering may be in the form of juice.”

Smoothies

Pureed fruits and vegetables in smoothies are considered juice and are subject to the limitation that no more than 50 percent of the fruit and vegetable offerings per week may be in the form of juice. Fruits and vegetables in smoothies are credited based on their volume when *pureed* (e.g. 1/4 cup *pureed* strawberries credits as 1/4 cup fruit juice). During recipe standardization, the creditable volume is determined after pureeing the fruit or vegetable, separate from the other ingredients. The minimum amount of creditable fruit or vegetable is 1/8 cup. Concentrated fruit puree and concentrated fruit juice can only be credited as fruit when they are reconstituted to full strength fruit puree or full strength juice. Otherwise, they are considered added sugar.

OVS Resources

The [OVS Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) and the [OVS webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) may be used as training resources (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf, https://dpi.wi.gov/school-nutrition/training/webcasts). Additionally, [Meal or No Meal](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx), a training resource inspired by a game show, may be used for staff determining reimbursable meals (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx). Practice OVS in the context of the Hudson School District's planned menus.

Production Records

Production Summary Lists, submitted off-site for breakfast and lunch for Hudson Middle School and Rock Elementary, do not meet the production record requirements per the "[Must Haves and Nice to Haves](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf)" list (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). Daily Production Records, obtained on-site for breakfast and lunch for Hudson Middle School and Rock Elementary, do not meet the production record requirements either.

The following information is missing from breakfast and lunch Daily Production Records:

- Grade grouping(s) (e.g. K-5, 6-8, K-8, 9-12)
- Actual number of servings prepared
- Planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb. case, 2-96 count case)
- Number of reimbursable and non-reimbursable (adult) meals planned and served
- Substitutions made for students with special dietary needs (keep dietary request form on file as supporting documentation)

Grain-Based Desserts

No more than 2.0 ounce equivalents (oz eq) of grain-based desserts can be offered per week at lunch. Grain-based desserts are designated with a superscript 3 or 4 on [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf). They must be whole grain-rich to credit towards the grain component. If a grain-based dessert is not whole grain-rich (made with more than 50 percent enriched grains), then it cannot credit towards the grain component. However, grain-based desserts count towards the weekly grain-based dessert limit regardless of whether or not they are whole grain-rich. Appleways Vanilla Wafers (1 oz eq) were planned, offered, and served during the review period, exceeding the 2.0 oz eq of grain-based dessert limit.

For additional information on grain-based desserts, watch "[The Grain Component](https://media.dpi.wi.gov/school-nutrition/grains-component/story.html)" webcast on our Training webpage (https://media.dpi.wi.gov/school-nutrition/grains-component/story.html).

Standardized Recipes

A standardized recipe is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time, when the exact procedures, equipment,

and ingredients are used. Recipes must be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen. Use the resources on the [Standardized Recipes webpage](#), including a checklist for pieces of information needed to standardize a recipe; tools to help analyze the meal component contribution; nutrient analysis tools; and [templates to organize all information once obtained](#) (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>). The PHN also encourages viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>). Recipes for lasagna and vegetable lasagna are not standardized to the operation.

Training

Consider Nutrikids Menu Planning 101 & Advanced Workshops, which provide overviews of the basics (e.g. enter ingredients, create recipes, build new menus, get a nutrient analysis and other needed reports, etc.) and advanced features (e.g. copy menus, analyze and modify menus to meet dietary guidelines, enter production quantities, create production records, etc.). For more information or to register for online webinars, visit the [Heartland School Solutions Upcoming Product Training webpage](#) (<https://www.heartlandpaymentsystems.com/school-solutions/training-event-category/nutrikids>).

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) SNT trainings. These are offered in the summer and select other times throughout the year. Travel and meals are allowable expenses to the nonprofit food service account.

The 2019 School Nutrition Skills Development Courses (SNSDC) dates and locations have been released:

- Appleton (Fox Valley Technical College): July 16-18, 2019
- Milwaukee (Alverno College): July 23-25, 2019
- Rice Lake (Wisconsin Indianhead Technical College): July 30-August 1, 2019
- Middleton (Kromrey Middle School): August 6-8, 2019
- Wausau (Northcentral Technical College): August 13-15, 2019

Registration and class schedules will be posted to the website in early May. Please visit the [Training webpage](#) for more information (<https://dpi.wi.gov/school-nutrition/training#up>).

Communications

Anyone involved with the USDA School Meal Programs may send an email to join-schoolmealsnews@lists.dpi.wi.gov to directly receive important School Nutrition program updates from the DPI. Additionally, the SNT Training Team hosts the [What's New with School Nutrition Webinar](#) on the second Tuesday of each month from 2:00 PM to 3:00 PM via Skype Meeting (<https://dpi.wi.gov/school-nutrition/training/whats-new>).

Findings and Corrective Action Required: Meal Pattern and Nutritional Quality

- ❑ **Meal Pattern Finding #1:** Ten students at Hudson Middle School selected non-reimbursable meals during lunch meal observation on Tuesday, March 5. Two students at Rock Elementary School selected non-reimbursable meals during lunch meal observation on Wednesday, March 6. Students left the point of service (POS) with insufficient fruits and/or vegetables to meet the 1/2 cup requirement, while others selected only two full components. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

Required Corrective Action: Submit three to five sentences describing how selection of non-reimbursable meals will be corrected and avoided in the future.

Meal Pattern Finding #2: The weekly minimum requirement for meat/meat alternate was not met for age/grade group 6-8 at Hudson Middle School for lunch during the review period. The following represent the portion sizes planned, offered, and served during the review period:

- Monday: Ham & Cheese Deli Meal (1.75 oz eq)
- Tuesday: Ham & Cheese Deli Meal (1.75 oz eq)
- Wednesday: Ham & Cheese Deli Meal, soft shell taco, hard shell tacos (1.75 oz eq each)
- Thursday: Pancakes with hash browns and sausage (1 oz eq)
- Friday: Ham & Cheese Deli Meal (1.75 oz eq)

The weekly minimum requirement for age/grade group 6-8 is 9 oz eq. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Describe **specifically** how the daily minimum requirement for meat/meat alternate will be met for age/grade group 6-8 at Hudson Middle School for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address Ham & Cheese Deli Meal, soft shell taco, hard shell tacos, and sausage in your reply.

Meal Pattern Finding #3: No more than 2.0 oz eq of grain-based desserts can be offered per week at lunch.

Required Corrective Action: Please submit a statement describing how you will comply with the weekly grain-based dessert limit going forward.

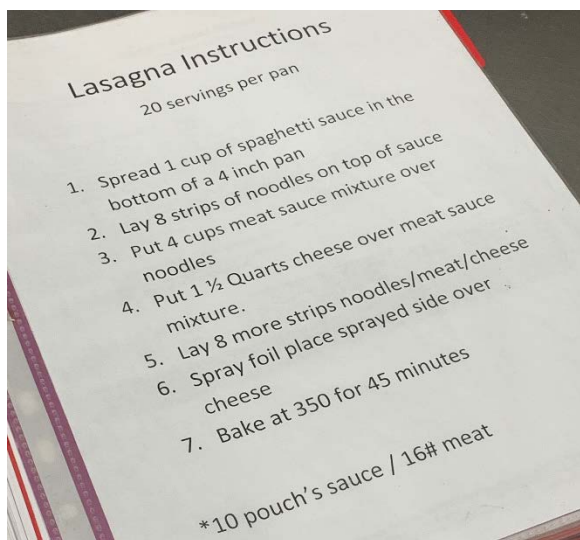
Meal Pattern Finding #4: A total of 5 1/2 cups of fruit, including whole fruit and juice, were offered to age/grade group 6-8 at Hudson Middle School at breakfast over the course of the week, with 5 1/4 cups of that in the form of juice. This exceeded the weekly juice limit at breakfast of 50 percent of the total fruit offering (95.45 percent of the total fruit offering).

Required Corrective Action: Submit one to two sentences explaining what will be done to the review period so that no more than 50 percent of fruit offerings are in the form of juice at breakfast over the course of the week.

Meal Pattern Finding #5: Daily Production Records, obtained on-site for breakfast and lunch for Hudson Middle School and Rock Elementary, do not meet the production record requirements.

Required Corrective Action: Update Daily Production Records to include the following missing information: grade grouping(s); actual number of servings prepared; planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb. case, 2-96 count case); number of reimbursable and non-reimbursable (adult) meals planned and served; and substitutions made for students with special dietary needs. **Please submit three full days of completed Daily Production Records for Hudson Middle School and Rock Elementary, updated to reflect these requirements.** Select Daily Production Records that you are confident meet the production record requirements and that are filled in completely.

Meal Pattern Finding #6: Recipe for R Lasagna Homemade : Hudson (000923) is not standardized to Hudson Middle School. During lunch meal preparation observation, lasagna was prepared following "Lasagna Instructions" rather than recipe 000923.



Required Corrective Action: Submit an updated standardized recipe for this menu item, which reflects corrected ingredients, portion sizes, yields, and crediting towards daily and weekly meal pattern requirements, as applicable.

3. RESOURCE MANAGEMENT

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

Annual Financial Report (AFR)

- 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 nonprogram food compliance which is highly recommended. The [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>).
- Refer to the webcast explaining the [Annual Financial Report](https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story_html5.html).
- Any nonprogram foods such as adult meals, catering, extra entrées, a la carte, or milk sold to students that is not being claimed for reimbursement, must be recorded as a Nonprogram Food revenue on the Annual Financial Report. You also need to calculate the expenditures related to these nonprogram foods so it can be documented on the Annual Financial Report.
- 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” (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc>).
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchased Services” report any time you pay someone for services provides such as equipment repair and health inspections.

- Under “nonprogram foods”, 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, a la carte, extra milk, extra entrees, and caterings would 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 an NSLP food expenditure for private schools and a purchased service for public schools.

Allowable Costs

- Bad debt from unpaid student lunch accounts is an unallowable expense to the food service program, specifically Fund 50.
- Best practice is to collect on unpaid meal charges while the student is still enrolled in the district. Once the student is no longer enrolled and you have exhausted all options to collect the money, you must make a transfer to Fund 50 to cover the student’s debt.
- Another best practice to control negative meal accounts is to have a good Unpaid Meal Charge Policy in place, clearly communicating the policy with households multiple times each year, and for it to be enforced by Administration.
- A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- The SFA has a policy in place but is not being enforced. The following is technical assistance regarding the policy and alternate meals.
- It is advised that the policy includes more detailed information regarding when households will be notified of negative account balances, how often and the mode of how they will be notified. If you choose to serve alternate meals to students that have reached a certain negative account balance that should be included in the policy as well.
- Notify the households of the policy at the beginning of the school year and many times throughout the year so they are aware.
- Students that are free eligible may not be denied a meal even if they have a negative account balance. If a Reduced eligible or Paid student brings money in hand to buy a meal that day, and they have a negative account balance, they must be allowed to purchase a meal that day.
- You may decide (highly recommend) to disallow students from purchasing a la carte items if the account is negative, but still allow them to take a reimbursable meal. This would not allow students to take items that do not equal a reimbursable meal. For example, if a student takes a milk and a slice of pizza and they have a negative balance, they can be told that purchase isn’t allowable with a negative balance, but if they added a half up fruit or vegetable to their tray, they could get the reimbursable meal even with a negative account balance.
- You may deny a reduced or paid student a meal if they have surpassed the negative amount set in the policy (for example, -\$20.00) and offer them an alternate meal.
- If students are not taking a reimbursable meal, they must be charged the a la carte (nonprogram food) price that covers the cost of those items as you are not getting federal reimbursement for anything but a reimbursable meal. You’ll want to make sure whoever is working the point of sale that they know what a reimbursable meal is and to make sure to ask students if they want to take a half cup fruit or vegetable and/or a third component to make a reimbursable meal. The more reimbursable meals you

serve, the more money you get in reimbursement for the program.

- If the policy states you will offer an alternate meal to students that surpass the negative amount set forth in the policy, you should state what the alternate meal will be and how the student will be notified they are receiving the alternate meal. You may also want to include where the student will receive the alternate meal. Some districts call the students to the office to discreetly tell the student they will be receiving the alternate meal that day on the lunch service line, or they will call the students to the office to hand them their alternate meal.
- The alternate meal is meant to encourage students to bring money or have their parent/guardian deposit money into their lunch account. You are still feeding the student by offering the alternate meal, but offering a less desirable meal option for them. You may refer to the [Unpaid Meal Charges “In a Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) to see your options regarding alternate meals. Depending on whether you claim, charge, or giveaway the alternate meals, there are rules for each option.
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>)
- If you decide to offer alternate meals free of charge and do not claim them, be sure to keep track of the number of alternate meals you serve throughout the year. Keep track of the food cost, labor, and other expenses as well. Make a transfer from Fund 10 or another non-federal fund (could be from donations) to Fund 50 to cover the costs of these alternate meals.
- You may have a stricter policy for the older grades than the younger grades, such as cutting the older students off from getting an alternate meal. This is a district decision.
- 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 snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf)
(<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf)
<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Refunds

- 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, or the money is going to another sibling in the district.
- 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/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: adult meals, extra entrées, extra milk, a la carte, catering, vending to Trinity Lutheran Academy
- Students purchase many a la carte items instead of the reimbursable meal. Use the [DPI Nonprogram Food Price Calculator Tool](#) to determine what you should increase the a la carte prices to and encourage students to purchase a reimbursable meal.

- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Catering events should be billed out to include the raw food cost of each item, labor involved, along with a 5-10% total markup to cover any overhead.
- The USDA Nonprogram Revenue Tool (the formula shown below) must be completed annually, at a minimum, to ensure all costs of Nonprogram foods are being covered. Using the Child Nutrition Report from Online Services, you can retrieve this data and complete this calculation to ensure you are covering all costs of nonprogram foods.

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

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, at a minimum, SFAs must follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).
- The SFA is charging an adequate amount for the adult meals.

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)

Indirect Costs

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

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local reality broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.

- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the SFA’s total.

Findings and Corrective Action Needed: Resource Management

❑ **Finding #1:** The Unpaid Meal Charge Policy must be updated to what the district plans to enforce.

Corrective Action Required: Update the Unpaid Meal Charge Policy. Submit a copy to the consultant.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

Civil Rights Training

- All staff involved with the National School Lunch Program must complete the Civil Rights training, annually. This is typically done prior to the start of the school year.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

Special Dietary Needs

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

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** Student meal eligibility status is visible on the point of sale (POS) screens which is unallowable as this is a form of overt identification. Students are assigned a code of 1, 2, or 7 to identify them as Free, Reduced, or Paid. Cashiers are using this to know if they need to prompt students to take a reimbursable meal or not. If the student is a reduced eligible or paid student, but not purchasing a reimbursable meal, the cashier won't ask the student if he/she wants to take a half cup fruit or vegetable to make a reimbursable meal. Instead, the student is charged for each individual item at the marked up cost, sometimes more expensive than a reimbursable meal. If the student is free eligible, then they have to make sure the student took a reimbursable meal and will send them back to do so. Best practice is to ask every student to take a reimbursable meal and depend on the student account balance to know if they can charge a la carte (nonprogram foods). Updating and enforcing the Unpaid Meal Charge Policy will help with this.

Corrective Action Required: Remove the eligibility status on all point of sale screens throughout the entire district. Submit a statement to the consultant that this has been completed and that no one looking at the POS screen can determine who is free or reduced eligible.

- ❑ **Finding #2:** The And Justice for All poster was not posted in a public setting at the Middle School.

Corrective Action Required: Move the poster and post it in the cafeteria rather than the kitchen. The public has access to the cafeteria, not the kitchen. **Corrected on-site. No further action required.**

- ❑ **Finding #3:** Special Dietary Needs forms are not being kept on file.

Corrective Action Required: Submit a statement of what the procedure will be to ensure that a signed special dietary needs form is signed by a licensed medical practitioner and is on file for any students whose meals are accommodated for due to special dietary needs.

Local Wellness Policy

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

Hudson School District has a Local Wellness Policy in place that could use an update to include all of the requirements. Technical assistance was provided on-site. Consider using the [Wellness Policy Builder](#) to create a new Local Wellness Policy (<https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1>).

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.

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](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). 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).

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>).

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 date 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.

Smart Snacks in Schools

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

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. The school campus is defined as all areas of the property under the jurisdiction of the school that are accessible to students during the school day. The school day is defined as the period from the midnight before to 30 minutes after the end of the instructional school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on the SNT [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Only **plain water** (flat or carbonated), milk (less than 12 fluid ounces; skim [flavored or unflavored] or low-fat [unflavored]), or 100% juice (less than 12 fluid ounces) may be sold to students in the 6-8 age/grade group. Consider replacing non-compliant products or locking specific machine rows. Sales of non-compliant beverages may not begin until 30 minutes after the end of the instructional school day.

DPI SNT recommends using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](#) (<https://foodplanner.healthiergeneration.org/calculator>) to assess product compliance. 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. Stapling a complete nutrition facts label with ingredient statement to the printout is a best practice.

Findings and Corrective Action Required: Smart Snacks

- ❑ **Finding #1:** Two beverages sold in the beverage vending machine were determined to be non-compliant with Smart Snacks standards.

Required Corrective Action: Submit a written statement confirming that the school will no longer sell LaCroix Natural Mango Essence and LaCroix Natural Passionfruit Essence sparkling water. Address intentions regarding using inventories of the non-compliant product and purchasing a compliant replacement product, if applicable.

Buy American

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

There are four pieces of information per non-compliant item that must be recorded on the [Buy American Non-Compliant Product List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) or SFA equivalent:

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

You may record additional information if you find it beneficial.

Finding: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American Non-Compliant Product List or SFA equivalent, or did not have proper labeling to identify the country of origin:

- Garlic powder from China
- Canned mandarin oranges from China
- Canned olives from Morocco
- Canned mushrooms from Holland
- Bananas from Honduras
- Snap peas from Mexico
- Cantaloupe from Guatemala
- Grapes from Peru

Alternatively, schools may use the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) to track product(s) which do not have country of origin labeling and for purchases that do not comply with the Buy American Provision (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx).

Professional Standards

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

Professional Standards: New Food Service Director Hiring Requirements

- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

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

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 Needed: Professional Standards

- ❑ **Finding #1:** Trainings are occurring but not being tracked on a spreadsheet.

Corrective Action Needed: Use the [DPI tracking tool](#) to track trainings. **Submit a copy of a completed tracking tool.**

Food Safety and Storage

Technical Assistance

- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- Any food that is a TCS food must be kept under refrigeration, on ice, or hot held (depending on the food). If not, it must be discarded after meal service.

Time/Temperature Control for Safety (TCS) Food

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

Time as Public Health Control

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

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** The Field Trip SOP was not in the Food Safety Manual.

Corrective Action Required: Using the [DPI Field Trip SOP](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx), edit it to be site specific and add it to your Food Safety Manuals at all schools that serve Field Trip meals (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx). Submit a statement to the consultant when this has been completed.

Reporting and Recordkeeping

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- Be sure to keep all documents pertaining to the School Nutrition Programs for 3 years plus the current school year. You may shred anything from the 14-15 SY and prior.

Summer Food Service Program (SFSP) Outreach

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

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 Hudson 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 your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).”



With School Nutrition Programs!