

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

School Food Authority: River Valley School District

Agency Code: 565523

School(s) Reviewed: (160) River Valley Early Learning Center

Review Date(s): 02/18/19 - 02/19/19

Date of Exit Conference: 02/19/19

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).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at River Valley School District for the courtesies extended to us during the review. Staff were available to answer questions and receptive to recommendations and guidance. The food service director has years of experience, which is of great value. Preparation and service areas are clean and tidy. The director also works hard to ensure staff have training in job-specific areas. The Authorized Representative is supportive and responsive to the needs of food service. Keep up the good work!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

240 eligibility determinations were reviewed, 3 errors were identified. The error rate is below the threshold that requires fiscal action, but all errors need to be corrected. The agency does *not* need to conduct an independent review of applications during the 19-20 SY.

Free and Reduced Price Meal Benefits

- Households who matched to direct certification and who were declined meal benefits were notified in writing; however, a copy of the communications were not retained. The agency was able to show the template type and historical run-date in the software system. Retain copies of each communication, either electronically or by printing a paper copy.
- The effective date for a Homeless student determination is the date the local official makes food service aware of their status. It is important that the determination be promptly communicated to the food service determining official to minimize accrual of unpaid meal charges.

Disclosure

Any individual that is provided with identifiable student eligibility information for state and federal reporting purposes should complete the [Disclosure Agreement Form for School Staff](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>) and retain a copy on file at the district,

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding #1:** Certification and benefit issuance errors as indicated on the SFA-1 and SFA-2 forms.
Corrective Action Needed: Send a notification to the households communicating their change in meal benefits. A decrease in benefits must be provided with 10 *calendar* days to appeal prior to changing their benefit in the point of sale. Submit a copy of the completed SFA-1 and SFA-2 forms to the consultant with the date of correction column completed. Once the 10 calendar days are over, submit screen shots in the software showing the new meal eligibilities are effective.
Completed. No further action required.
- ☐ **Finding #2:** The denial template has the wrong non-discrimination statement and does not contain a reason for denial. The notification must advise the household of:
 - reason for denial of benefits;
 - right to appeal;

- instructions on how to appeal; and
- ability to reapply for benefits at any time during the school year

Corrective Action Needed: Update the SFA’s template to be in compliance, or use the DPI template. Submit a statement to the consultant communicating the action that will be taken.

□ **Finding #3:** The agency does not have disclosure agreements on file. An agreement form should be signed by any individual, or an organization, that is receiving individual student free and reduced price school meal eligibility information for purposes *other than school meal benefits*.

Corrective Action Needed: Complete the [Disclosure Agreement for School Staff](#) for any individual that is provided with individual student eligibility information for state reporting purposes or local program fee waivers.

Verification

Technical Assistance (TA)/Compliance Reminders

- The Verifying Official (VO) should also sign the back of an application that was selected for as part of the verification sample. This documents the process was completed.
- The [Verification Tracker Form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form-1819.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form-1819.docx), found on the [SNT Verification website](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) can be used to document the confirmation and verification process.

Findings and Corrective Action Needed: Verification

- ✓ **Finding #1:** The confirmation review was not documented, which proves the review was completed.

Corrective Action Needed: In future years, conduct the confirmation review and then document completion. A great place for this is on the back of the application or tracker form. By signing off on this report, you agree to complete this practice moving forward.

No further action required.

- ✓ **Finding #2:** The “We Have Checked” letter was not sent to the household. This letter notifies the household of the results of verification. In cases of adverse action (a decrease in meal benefits), the household must be provided with 10 *calendar* days to appeal prior to changing their benefits.

Corrective Action Needed: Submit a statement agreeing to notify the household of the verification result and to provide 10 days of adverse action when verification results in a decrease in benefits.

Completed onsite. No further action required.

Meal Counting and Claiming

Comments/Technical Assistance (TA)/Compliance Reminders

Field Trips:

All meals claimed for reimbursement must be counted, recorded, consolidated, and reported through a system that *consistently* yields accurate claims. Meals must be claimed *at the point of service* where it can be determined that the student has all components required for a reimbursable meal. This can be accomplished by sending a student roster list with the bag lunches. An adult should check-off the student name *as they receive the meal* and return the completed form to food service. Food service

would then enter the completed form into the POS system. This ensures meals are claimed by participation and not by forecast.

Non-reimbursable Meals

8 non-reimbursable meals are subject to fiscal action. 4 non-reimbursable meals were observed on the day of review and 4 non-reimbursable meals for a repeat weekly grain shortage at breakfast.

Severe Need Breakfast

The online contract was updated to approve (120) River Valley Elementary at the Severe Need Breakfast reimbursement rate. The SFA submitted 3 months lunch count data to support severe need prior to the audit. Claims have been approved to retro reimburse the agency for September 2018-January 2019. No other site qualifies at this time.

Point of Service (POS)

All meals claimed for reimbursement must be counted, recorded, consolidated, and reported through a system that *consistently* yields accurate claims. Meals must be claimed at the point of service where it can be determined that the student has all components required for a reimbursable meal.

Findings and Corrective Action Needed: Meal Counting and Claiming

- Finding #1:** Inaccurate point of sale at Breakfast at River Valley Early Learning Center. Meals claimed are based on a forecast count and by backing out those that did not take a meal from the forecast. Consider having food service manage the point of sale.

Corrective Action Needed:

- Correct the point of sale and retrain staff.
- Submit a statement explaining the new system along with a training roster of staff that attended.
- Once the system is corrected, submit 30 *consecutive operating* days of clean counts. This means you will have to run your edit check report for a range of dates that will cover two different months.

- Finding #2:** Inaccurate point of sale at lunch for 4K only at River Valley Early Learning Center. Meals claimed are based on a forecast count and by backing out those that did not take a meal from the forecast. Consider having the 4K enter their PIN numbers like all other students at the office window.

Corrective Action Needed:

- Correct the point of sale and retrain staff.
- Submit a statement explaining the new system along with a training roster of staff that attended.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at River Valley School District for working to provide documentation prior to and as requested during the on-site review. Staff was friendly and professional. The willingness to learn and make changes as needed was evident. Thank you for all you do for the students at River Valley!

Comments/Technical Assistance/Compliance Reminders

Meal Pattern/Crediting

As a reminder, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the USDA *Food Buying Guide* for School Meal Programs. A complete CN label includes the following: CN logo, product name, ingredient statement and inspection legend. It is important to save actual CN labels from product packaging that include these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label. When a CN label is not available for a processed product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

Signage was posted on the salad bar to indicate the quantity of various items needed in order to meet the ½ cup fruit/vegetable requirement under OVS. However, sliced apples were served at breakfast and lunch and the number of slices per half cup has not been determined. Additionally, the sign stated that 6 baby carrots credits as ½ cup vegetable. However, the carrots used looked small, and it is recommended that this number be re-evaluated. The procedures for an [in-house yield study](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) can be used for this situation (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

- To determine the quantity of each item needed to credit as ½ cup, you can either
 1. Slice/dice the item and to see how many are needed to fill the desired portion utensil OR
 2. Use the Food Buying Guide to determine the weight of the desired portion and then weigh the item to figure out quantity needed.

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

Heaping scoops are used to provide the desired weight of mashed potatoes. This practice is strongly discouraged as it is difficult to ensure consistency when not using full, level scoops. The proper scoop size should be determined for future service.

[Menu planning worksheets](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) are a great tool that can be used to ensure the planned menu meets all daily and weekly meal pattern requirements for the appropriate age group (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g. salad made by mixing spinach and iceberg lettuce). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that

kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

Offer versus Serve (OVS)

Prior to meal service, it is important that the menu planner decides how large fruit, grain and combination items will count towards OVS requirements at breakfast. For example, a grain item crediting as 2 oz eq of grain can count as 1 food item or 2 food items at the discretion of the menu planner. Students and POS staff should be clear how items are planned. Ensuring that signage is correctly filled out with planned food items can aid in the selection of reimbursable meals.

Signage should be placed at or near the beginning of the service line to aid students in identifying what constitutes a reimbursable meals. Currently signage is posted in the hallway across from the office where students enter their PIN number at lunch. It is recommended that the signage be moved to the gym/cafeteria entrance or along the wall of the serving line. Additionally, signage should more clearly communicate what a student can and must select in order to have a reimbursable meal (ex, at least 3 components at lunch and 3 food items at breakfast). If you are interested in ordering signage from SNT, please visit the [Team Nutrition](https://dpi.wi.gov/team-nutrition) webpage and complete the Resource Order Form, under the Resources heading (https://dpi.wi.gov/team-nutrition).

Findings and Corrective Action Needed

❑ **Finding #1:** Overall, production records are being filled in fairly completely. However, there are a couple improvements that must be made. A list of production record requirements (“[Must Haves and Nice to Haves](#)”) and sample production record templates can be found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

- Must document planned/actual number of servings prepared as well as 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 should be recorded
- When a variety of something is offered, each type needs to be documented separately on the production record (Ex. cereal, poptarts, juice, etc.)
- Accurate portion sizes must be documented for each menu item (ex. ½ cup vs. 4 oz serving based on volume)

Corrective Action Needed: Submit one week of completed production records for breakfast and lunch that are in compliance with all production record requirements.

❑ **Finding #2:** The breakfast menu, as served resulted in a weekly grain shortage at breakfast as the minimum offering was 5 oz eq, which is short of the weekly minimum grain requirement of 7 oz eq for K-5 students. This was due to a 1 oz eq muffin being offered daily.

Corrective Action Needed: Students selecting the muffin will be offered a 4 oz yogurt as well.
Corrected on site, no further action needed.

Note: this was a repeat finding, so muffin meals for one day during the week of review will be reclaimed (four muffin meals served on 1/9 are subject to fiscal action)

- ✓ **Finding #3:** The lunch menu, as served resulted a daily grain shortage at lunch for the K-5 meal pattern. This grade group must be offered a minimum of 1 oz eq of grain daily.
 - Tuesday 1/8 – popcorn chicken 0.75 oz eq grain (serving size was 11 pieces)

Corrective Action Needed: Serving size for popcorn chicken will be increased to 12 pieces.
Corrected on site, no further action needed.

☐ **Finding #4:** Food service staff at River Valley Early Learning Center were unclear about the OVS requirements for breakfast as well as determination of food items for the planned menu. It is crucial that staff are well trained in recognizing a reimbursable meal under OVS. Additional training should be done as well as ongoing communication regarding the crediting of the daily menu.

As a reminder, students are not required to select an entrée option as long as they have selected at least 3 food items, including ½ cup fruit and/or vegetable. Additionally, students cannot be required to select additional items if they have already selected a reimbursable meal.

The [Offer Versus Serve Guidance Manual](#) and the [Offer Versus Serve Webcasts](#) (Offer versus serve and Offer versus serve – Meal or No Meal Lesson and Game) can be used as a training resource (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf> and <https://dpi.wi.gov/school-nutrition/training/webcasts>).

Four non-reimbursable meals were observed during breakfast due to students not selecting three food items as part of their reimbursable breakfast.

Corrective Action Needed: Submit a training plan and signed roster once training has been completed for staff involved in serving and/or determining if reimbursable meals have been selected.

☐ **Finding #5:** Signage must indicate that students must select at least ½ cup fruit and/or vegetable, or a combination with a reimbursable meal. Currently, signage does not list this.

Corrective Action Needed: Submit a picture of the signage changes or supplementary signage posted.

Please note that repeat violations involving food quantity shortages on future Administrative Reviews may result in fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

The agency is in compliance.

Paid Lunch Equity (PLE)

The agency is in compliance.

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.

- 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.***
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The DPI Nonprogram Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food revenue ratio regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

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, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A Wisconsin Adult Meal Pricing Worksheet 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>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The 18-19 SY reimbursement rates should be used to determine adult prices for the 19-20 SY.

Findings and Corrective Action Needed: Nonprogram Foods

Finding #1: The Nonprogram Foods Tool reflects a revenue shortfall.

Corrective Action Needed: Review and increase nonprogram food pricing for the 19-20 SY. Submit an updated Nonprogram food tool, which reflects planned pricing.

Finding #2: The adult breakfast price is not set high enough per FNS 782-5, which ensures the per meal student revenues are not being used to subsidize adult meals.

Corrective Action Needed: Raise the School Breakfast adult meal price to a minimum of \$1.88. Consider charging \$1.90 or \$2.00 for ease in money collection.

- Update your 18-19 SY online contract meal charge page
- Submit a record from your software point of sale as proof that the new rate was implemented

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance (TA)/Compliance Reminders

Civil Rights Training

Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. This includes building principals that help with unpaid meal charge collection and may be granted knowledge of a student's F/R status in order to assist.

Special Dietary Needs

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

Processes for complaints

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

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:

- Local news media
- Grassroots organizations (local organizations providing services to populations in need)
- 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.

Findings and Corrective Action Needed: Civil Rights

- Finding #1:** The public release was not distributed.

Corrective Action Required: Submit a statement to the consultant outlining where the public release will be distributed in the 2019-20 SY.

- Finding #2:** The free and reduced application denial template does not contain the correct non-discrimination statement.

Corrective Action Required: Send a copy of the updated template that reflects the most current [nondiscrimination statement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc) to the consultant.

- Finding #3:** Other staff that have a role in school food service do not have Civil Rights Training. This includes the Authorized Representative, Direct Certification runner, determining official, and social worker that assists with unpaid meal charge collection.

Corrective Action Required: Review the [Civil Rights PowerPoint Presentation](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx). Submit a [sign in sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/civil-rights-training-attendance-record.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/civil-rights-training-attendance-record.doc) with the names and date(s) the training was reviewed.

On-site Monitoring

The agency is in compliance.

Local Wellness Policy (LWP)

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

The agency has a great LWP. As a reminder, the first triennial assessment should be completed in SY 20-21. The assessment should measure how you are meeting your goals and objectives and how your policy compares to a model policy. The report card and WellSat tool can be used to assist the agency in meeting this requirement. For more information, see the SNT [Wellness Policy website](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy).

Smart Snacks in Schools

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. Foods and beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption.

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but this may not occur in the meal service area during meal service times.

There is no required template that must be used to track fundraisers or products sold that are subject to Smart Snacks standards. However, tracking tool templates are available on the [Smart Snacks page](#) of our website and may be helpful in tracking this information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). Locations where exempt fundraisers occur, must be documented to ensure compliance with the regulation.

The [Smart Snacks in a Nutshell](#) document provides a great overview and summary of the general standards, nutrient standards and allowable beverages for your reference (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).

Findings and Corrective Action Needed: Smart Snacks in Schools

No findings.

Professional Standards

Training is documented is well. The food service director works hard to complete trainings herself as well as ensure her staff have the training they need to excel in their job-specific role.

Water

The agency is in compliance.

Food Safety and Storage

Food preparation and storage areas are clean and tidy. The student-dining environment is pleasant.

Technical Assistance/Compliance Reminders

SNT has a template Standard Operating Procedure (SOP) available for offsite meal consumption (e.g., [Field Trips](#) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx)). Any site that offers reimbursable field trip meal should train staff on the point of sales and food safety procedures.

Findings and Corrective Action Needed: Food Safety

- Finding:** River Valley Early Learning Center is not following the SOP for *Use of Milk Barrels: Monitoring Temperature Option*. Temperature logs are not kept and milk is placed back in the milk cooler (reused) after service.

Corrective Action Needed: Submit a statement explaining how the process or SOP will be corrected. If you will begin using the milk temperature log, submit 1 week of completed logs.

Schools may reuse milk if the temperature log shows that milk has been maintained at 41 degrees fahrenheit or below when temperature of the barrel is monitored.

Buy American

Comments/Technical Assistance/Compliance Reminders

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

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

- Labels should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, the SFA must get certification from distributor or supplier stating: "We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the [SNT Procurement webpage](http://dpi.wi.gov/school-nutrition/procurement/buy-american) (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

The following products were found without a clear country of origin indicated on the product or product packaging. This will be treated as technical assistance for the 2018-19 school year, but work with your distributor/supplier to move toward compliance.

- Tartar sauce
- Taco sauce
- Garlic powder (product of USA and China)
- Canned peas
- Kraft lite ranch
- Ground thyme
- Italian herbs
- Canned diced fruit mix
- Del monte green beans
- Turkey sausage patties
- Apple/cherry juice

Findings and Corrective Action Needed for Buy American:

❑ **Finding #1:** While reviewing product storage for compliance with the Buy American provision, grapes from Chile, frozen California vegetable blend from Mexico, and bell peppers from Mexico were found without a noncompliant product form on file.

Corrective Action Needed: Submit [documentation](#) for an exception to the Buy American provision for these items or documentation for domestic products that will be used in their place (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

If you have additional questions regarding the Buy American provision, please contact Alex Zitske (alex.zitske@dpi.wi.gov or 608-267-9822) to discuss further and ensure that procurement, monitoring and tracking are being done properly.

Reporting and Recordkeeping

The agency is in compliance.

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

Breakfast Promotion

Information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](#) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>). A [Breakfast in the Classroom Toolkit](#) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](#) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at River Valley 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](#) 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](#) 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](#) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on the Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action: SBP and SFSP Outreach

- Finding:** The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).

Corrective Action Needed: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and timeframe for distributing SFSP outreach materials.

Wisconsin School Day Milk Program (WSDMP)

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

Calculating the “Cost per half pint of milk” for the *annual* claim:

$$\begin{aligned} & \text{Total dollar amount spent on milk that month} \div \text{Total number of milks purchased that month} \\ & = \text{Average cost per half pint} \end{aligned}$$

When the WSDMP claim is submitted at the end of the year, the monthly averages would then be averaged to determine the “Cost per half pint of milk” for the entire year.

Findings and Corrective Action: Wisconsin School Day Milk Program

□ **Finding:** The [PI 1464](https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf) (https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf) paper contract is outdated and does not accurately reflect the current operation of the program at River Valley Community School District.

Corrective Action Required: Submit an updated paper contract to the consultant.

“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!