

# USDA Child Nutrition Programs Administrative Review Summary Report

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**School Food Authority:** Brown County CDEB – Syble Hopp      **Agency Code:** 56905

**School(s) Reviewed:** Brown County CDEB – Syble Hopp

**Review Date(s):** January 12-13, 2017

**Date of Exit Conference:** January 13, 2017

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

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

## **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the [DPI SNT webpage](#).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the [DPI SNT GOALS webpage](#).
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the [DPI SNT Financial Management webpage](#) under *Unpaid Meal Charges* section.

## **Appreciation:**

Thank you to the staff at Brown County CDEB – Syble Hopp for the courtesies extended to us throughout the Administrative Review process. Thank you for taking the time to respond to the off-site questions as well as pulling records for the on-site portion of the review, being available for in-person questions and for providing additional information when requested. All were very receptive to recommendations and guidance. It was a pleasure visiting Brown County CDEB – Syble Hopp.

# REVIEW AREAS

## 1. MEAL ACCESS AND REIMBURSEMENT

### Certification and Benefit Issuance

57 eligibility determinations were reviewed, zero (0) errors were identified. All free/reduced applications and the Direct Certification (DC) runs were available for review.

The SFA is provided the following technical assistance for Certification and Benefit Issuance by sub-topic to ensure the SFA is aware of program details and updates. *Corrective Action* is requested for specific sub-topics following the section.

### 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 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 (DO) either via application or Direct Certification (DC). Please see *Corrective Action* following this section requesting a statement to ensure benefits are only provided to students on the date determined by the DO at the SFA. No backdating is allowed in USDA Child Nutrition Programs. Additionally, the SFA is encouraged to review the sub-section *Effective Date of Eligibility* to determine if this option is of value for the SFA to apply.

### Limited English Proficiency (LEP)

Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.

To assist SFAs in reaching households with limited English proficiency, the DPI SNT provides the Wisconsin-ized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian on the [DPI SNT Free and Reduced Price Meal Applications and Eligibility webpage](#).

### Annual Income

If the household provided only annual income on the meal application, the SFA must follow up with the household to ensure that the amount is an accurate reflection of the household's current income.

### Application Forms

If choosing to use the DPI SNT template application materials, the most current versions of each letter must be used. These letters can be found on [DPI SNT Free and Reduced Price Meal Applications and Eligibility webpage](#). These forms **must** include an individual at the SFA that households can contact should they have questions about the application and the contact information of the Hearing Official (HO) should a household wish to have their application reviewed by an individual not involved in the original determination.

Additionally, as noted in the *Civil Rights* section, *Processes for Complaints* sub-section of this report, SFAs should have procedures for handling civil rights complaints. The procedures are recommended to be in writing and should include the contact information of an individual(s) within the SFA that can process complaints according to civil rights compliant procedures. Syble Hopp should review their procedures and make them known to their households.

It was noted that Syble Hopp used outdated DPI template materials to communicate meal benefit and verification information to households. Please see *Corrective Action* following this section requesting a statement to ensure current template materials are used in the future or, if developing own materials, they include all required elements as noted in the [Eligibility Manual for School Meals](#).

Lastly, as discussed during the on-site, Syble Hopp reported the Hearing Official (HO) as BCCDEB President; however, the Syble Hopp Administrator/Interim Administrator is listed in the online School Nutrition Contact. Please discuss as an SFA while reviewing civil rights procedures and update the contract accordingly with the correct HO.

### Transferring Students

SFAs can share eligibility data with other districts when requested for specific students but are not required to do so, as noted on page 39 of the [Eligibility Manual for School Meals](#).

If a student(s) received free meals via Direct Certification (DC) at a previous SFA, a copy of the DC run with all names blacked out except for the student(s) requesting free meals should be obtained from the prior SFA. The date of the DC run as well as the match code for the student(s) should be visible to the new SFA. If a student received free meals via application at a previous SFA, a copy of the original application should be obtained. Alternatively, the student(s) can be run individually through DC or complete a new meal application with the new SFA.

### 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 received if a process is in place to capture when the application is received. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The DPI SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at [karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov) for more information and approval.

### Disclosure

SFAs must seek written consent from the household to use information provided on the meal application or through DC for non-food service program purposes, such as athletic or testing fee waivers. Consent must be obtained each school year. A template [Sharing Information Form](#) is located on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

Alternatively, a SFA can ask programs requesting benefit information to have households self-disclose by providing a copy of their [Letter to Households of Approval/Denial of Benefit](#) notification letter. This option is encouraged as it reduces administrative work by the SFA.

A [Disclosure Agreement](#) form should be signed and on file at the SFA for anyone receiving eligibility information to approve students for non-food service program benefits. This form can be found on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

### **Verification**

Syble Hopp completed verification within the required timeframe in SY16-17; however, Syble Hopp is encouraged to start the process prior to November to ensure timely receipt of documentation from the selected household(s) and completion of verification activities by November 15. The appropriate number of applications (1) were selected for verification based on Standard Sampling. Documentation indicated a confirmation review took place by the Confirming Official (CO). The Verification Collection Report (VCR) was updated while on-site to correctly indicate the application sample pool as of October 1st (originally reported as of October 31<sup>st</sup>) and to report *Direct Verification* was not completed by the SFA. The SFA did use one outdated DPI template letter. As noted above in the *Certification and Benefit Issuance* section, *Application Forms* sub-section, a *Corrective Action* statement has been requested as to how the SFA will ensure current and required language is used in future communications regarding the National School Lunch Program (NSLP).

### **Meal Counting and Claiming**

Lunch was observed on Thursday, January 12, 2017. Reimbursable meals were correctly identified and claimed. No meal counting errors were observed.

The December 2016 claim for reimbursement was reviewed and validated. No errors were identified in meal claiming.

### **Findings and Corrective Action Needed**

**Finding #1:** While the SFA is provided 10 calendar days in which to process meal applications, benefits can only be provided on the date the Determining Official (DO) processes the application. Additionally, Direct Certification (DC) benefits can only be provided as of the DC run date. Benefits cannot be extended to the beginning of the week or month (backdating), as was noting as happening in the month of September and October. This was not observed in the month of focus for the review, December 2017.

**Corrective Action Required:** As noted in the *Meal Access and Reimbursement* section, *Applications* sub-section, please submit a detailed statement indicating the SFA understands students are eligible for free or reduced price meal benefits on the date their eligibility is determined by the DO either via application or DC. No backdating is allowed in USDA Child Nutrition Programs.

As noted above, the SFA is encouraged to review the *Meal Access and Reimbursement* section, sub-section *Effective Date of Eligibility* to determine if this option is of value for the SFA.

**Finding #2:** As noted in the *Meal Access and Reimbursement* section, *Application Forms* sub-section, Syble Hopp used outdated DPI template materials to communicate meal benefit and verification information to households.

**Corrective Action Required:** Please submit a statement indicating how the SFA will ensure current DPI template materials are used in the future or, if developing own materials, they include all required elements as noted in the [Eligibility Manual for School Meals](#). The current DPI SNT template application materials can be found on [DPI SNT Free and Reduced Price Meal Applications and Eligibility webpage](#). Additionally, please indicate the individual(s) households will be instructed to contact at the SFA should they have questions on their application or wish to have a hearing.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Cold Lunches

When Syble Hopp has an unexpected early release day due to weather, they offer a cold lunch option to students. Syble Hopp must purchase and keep these cold lunch items on-hand because West De Pere School District is not able to deliver meals to Syble Hopp any earlier than when they usually do. This poses a challenge because Syble Hopp has limited storage space and is not able to cook or heat items. These lunches must still meet meal pattern requirements; a meal pattern requirement table is found here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf>. During the on-site review, technical assistance was given on how to make sure these meals meet meal pattern requirements, and the difference between what must be offered and what a student has to take under Offer versus Serve (OVS). It sounds as though Syble Hopp has a good plan in place for how to offer these meals while meeting meal pattern requirements.

### Portioning Meat/Meat Alternates

Meat/meat alternates (M/MA) are credited by weight, not volume. Practically speaking, however, M/MA such as taco meat and orange chicken are portioned by volume (usually using a spoodle). A “3 oz” spoodle measures volume, not weight—it should actually read “3 fluid oz.” To determine how to portion M/MA, first weigh out the portion of the product that you wish to serve. For example, you may wish to serve 3.17 oz of taco meat by weight to provide 2 oz eq M/MA. Then determine which size serving utensil 3.17 oz fits into. This portion utensil should be designated on the transport sheets (or somewhere else easily accessible) so that serving staff know what to use.

### **Findings and Corrective Action Needed**

**Finding #3:** The transport sheets (that serve as production records) usually list the planned portion size of vegetables as ½ cup. The daily vegetable requirement is ¾ cup for grades K-8, and 1 cup for grades 9-12. Students can take unlimited fruits and vegetables, but this isn't apparent when looking at the production records. Technical assistance was given prior to the on-site review about this, and it was determined that the vegetable requirements are being met, they just aren't always reflected on the production records. Students of all grades need to leave the line with ½ cup fruit and/or vegetable; therefore, if the planned serving size of a vegetable is 1 cup, a student may request to only have ½ cup if they wish.

**Corrective Action Required:** Please submit a written statement explaining how and where you will document that both grades K-8 and 9-12 are meeting their daily and weekly vegetable requirements.

**Finding #4:** On the day of lunch observation, the menu included two 2-oz hashbrowns which were being credited as ¼ cup vegetable each. According to the Food Buying Guide (FBG), a 2.25 oz hashbrown credits as ¼ cup vegetable. Therefore, a 2 oz hashbrown credits as 1/8 cup vegetable. An in-house yield study can be completed if you wish to credit a product differently than how it is credited in the FBG. Information on an in-house yield study, including a template you may use to document your results, is found here: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>. Even if an in-house yield study is done and results in crediting one hashbrown patty as ¼ cup vegetable, keep in mind the daily vegetable requirements for each grade group. It is not advisable to offer students in grades 9-12 four hashbrown patties, from both a caloric and food cost standpoint. Therefore, we discussed adding another vegetable to the menu on the days that hashbrowns are offered.

**Corrective Action Required:** Please submit a written plan explaining how you will ensure that the menu days that offer hashbrown patties will meet the daily vegetable requirement of ¾ cup for K-8 and 1 cup for 9-12. Please also explain how you will credit the hashbrown patty. Please submit documentation supporting the results of an in-house yield study if you choose to do one.

## **3. RESOURCE MANAGEMENT**

### **Nonprofit School Food Service Account**

Access to the SFA's Child Nutrition Report, which provides a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, is described in the document [Viewing the Child Nutrition Report](#). The DPI Aids Register is also available to track all program deposits made to the SFA's account as well as the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. The Aids Register is available on the DPI SNT [Financial Management webpage](#). Both resources are also accessible from the [Online Services webpage](#).

Syble Hopp flagged for a comprehensive resource management review in the *Nonprofit School Food Service Account* section for an ending fund balance in excess of 3 months of operating expenses, which is considered an “Excess Cash Balance”. Discussion with the Syble Hopp Financial Manager indicated the salary of the Syble Hopp Food Service Staff has not historically been charged to the account. It is projected that inclusion of this expense will bring the ending balance within three months of operating expenses. The Financial Manager asked the best way to determine the amount to charge to the account as the Food Service Staff also performs duties as an educational aide. As noted below in *Indirect Costs* section, guidance will be provided to Syble Hopp after consultation with DPI SNT Financial Specialists.

In addition, discussion was had with the Financial Manager regarding the crediting of USDA Foods and milk purchases in the SFA’s current joint agreement. Further guidance will be provided to Syble Hopp following discussion with DPI SNT Procurement and USDA Foods Specialists.

### Annual Financial Report

In SY 16-17, all revenues including reimbursements and student payments and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. Please note there are additional categories than in previous years:

- **NSL** - schools participating in the National School Lunch Program.
- **SB, SBSEVERE** - both regular School Breakfast and Severe Need Breakfast.
- **SK-NSL, SK-NSLAE** - both After School Snacks and Area Eligible After School Snacks.
- **SMP** - Special Milk Program.
- **Grants** - all grant awards and expenditures.
- **WSDMP** - Wisconsin School Day Milk Program.
- **EN** - Elderly Nutrition.
- **Nonprogram Foods** - all Nonprogram Foods (including: a la carte items, adult meals, milk only, extra entrees, vended meals sold under a joint agreement, catered meals, vending machines, etc.)
- **CACFP** - daycare and supper meals claimed under Child and Adult Care Food Program.
- **SFSP** - meals claimed in Summer Food Service Program.

The [new SY 16-17 Annual Financial Report instructions](#) are located on [DPI SNT Financial Management webpage](#).

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](#). For a more comprehensive overview, see [SP 58-2016: Unpaid Meal Charges Guidance](#). In addition, bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs, as noted in [SP57-2016 Unpaid Meal Charges Guidance](#).

### **Paid Lunch Equity (PLE)**

Syble Hopp is in compliance with PLE and has correctly completed the most recent PLE tool to set prices for SY 16-17.

## Revenue from Nonprogram Foods

Syble Hopp flagged for a comprehensive resource management review in the *Revenue from Nonprogram Foods* section. SFAs that sell **only nonprogram milk** and **adult meals** as nonprogram foods, like Syble Hopp, are exempt from completing the USDA Nonprogram Food Revenue tool. However, SFAs like this are still required to separate out nonprogram milk and adult meal costs from program costs and nonprogram milk and adult meal revenues from program revenues to be in compliance with nonprogram food regulations. Syble Hopp does have procedures in place to separate out these revenues and expenditures. Please note, should Syble Hopp in the future serve a visiting student(s) a meal, the student(s) should be charged the adult meal price as the SFA is not claiming and receiving federal reimbursement for the meal.

## Indirect Costs

Allowable expenditures assessed to the food service fund must be supported with documentation. Syble Hopp will begin charging the salary of Food Service Staff to the food service account. As noted above, follow up guidance will be provided to Syble Hopp after collaborating with the DPI SNT Financial Specialists on the best way to determine the amount to charge to the account as the Food Service Staff also performs duties as an educational aide

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

#### Nondiscrimination Statement

Syble Hopp used older DPI template materials which contained an outdated USDA Non-discrimination statement. *Corrective Action* requested for *Finding #2* will ensure the current USDA Non-discrimination statement is used in the future.

Additionally, as a reminder, if Syble Hopp develops communications for households on the National School Lunch Program (NSLP), the communications should include the full USDA Non-discrimination statement, which is available on the [DPI SNT Civil Rights webpage](#). When space is limited, such as on printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

#### And Justice for All Poster

An “And Justice for All” poster was available and readable in the cafeteria

#### Civil Rights Training

Civil rights training was completed and documentation was available for review.

#### Civil Rights Self-Compliance Form

The Civil Rights Self-Evaluation Compliance form was completed by October 31st.

### 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 practitioner. SFAs may use the [template Dietary Request Form](#) posted on the [DPI SNT Special Dietary Needs webpage](#). This template is also available in Spanish and Hmong. SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner.

School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA still have a completed Dietary Request Form on file from a medical authority, such as a school nurse, to support the request. These types of accommodations must be made according to the USDA's meal pattern requirements in order for the meals to be claimed for reimbursement. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are being handled equitably.

### Processes for Complaints

SFAs must have processes for receiving and processing complaints alleging discrimination within USDA Child Nutrition Programs. All verbal or written civil rights complaints must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. SFAs 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 the individual's right to file. The [USDA Program Discrimination Complaint Form](#) is available to assist in filing these complaints and can be found on the [DPI SNT Civil Rights webpage](#).

### **Local Wellness Policy**

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 of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements 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 each school complies with the policy.

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. SFAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards and the Smart Snacks in School nutrition standards.

- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years (Triennial Assessment) to determine compliance with the policy, how the policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment, as well as the wellness policy and any updates to the policy, available to the public.

A summary of the requirements can be found at: [http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](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 process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Syble Hopp's Local Wellness Policy (LWP) was reviewed and the SFA is reminded of the following:

- Smart Snacks Standards apply to all foods sold outside of the reimbursable meal. Syble Hopp is encouraged to compare and update nutrition standards noted in their LWP to these standards.
- Food and beverage marketing guidelines should be included in the LWP.
- Evidence-based strategies for nutrition promotion, such as [Smart Lunchrooms](#), should be explored and considered for inclusion.
- Language should be included regarding the assessment to be completed every 3 years along with information on how the results of the assessment will be made available to the public.

### **Smart Snacks in Schools**

There are no competitive foods or beverages that are regularly sold at Syble Hopp. If Syble Hopp starts selling competitive foods/beverages, or if any food/beverage fundraisers are held on the school campus during the school day, the Smart Snacks rule must be followed. More information on the rule can be found on the [DPI SNT Smart Snacks webpage](#).

Syble Hopp held one food fundraiser this school year that lasted for two consecutive days. This meets the definition of an exempt fundraiser. Each organization can have two exempt fundraisers per school year. Each exempt fundraiser can last no more than two consecutive weeks in length. Exempt fundraisers should be tracked in some way to ensure that Smart Snacks requirements are being met. The DPI SNT Smart Snacks webpage (link above) includes template tracking tools you may use if you wish.

## Professional Standards

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

Syble Hopp currently reports two food service staff for Professional Standards, with the ‘director’ noted as the West DePere Food Service Director. As Syble Hopp is its own SFA, for Professional Standards, the SFA must select an employee of Syble Hopp to take on the role of ‘director’. Syble Hopp is encouraged to consider the Syble Hopp Food Service Staff member as ‘director’ for means of Professional Standards as she has been with Syble Hopp food service for the last three years, has completed ServSafe in SY 15-16 and has surpassed the continuing education hours required for ‘directors’ in SY 15-16 with 13 hours.

In addition to training completed and tracked by Syble Hopp Food Service Staff, the Syble Hopp’s Determining Official (DO) and Financial Manager should maintain documentation of continuing education completed for participation in USDA Child Nutrition Programs. Although not preparing and serving food directly, these individuals are responsible for processing applications and Direct Certification (DC), completing verification, properly distributing meal benefits, managing the non-profit food service account, completing the Paid Lunch Equity (PLE) tool, and submitting the annual food service annual financial report.

Continuing education can be tracked minute-for-minute and be obtained in a variety of formats (online, in person, webinars) from various providers (DPI, USDA, in-house, etc.). Training must be job-specific and help employees perform their duties well.

**Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

<b>Directors</b>	<b>Managers</b> (20 hrs or more/week)	<b>Other Staff</b> (less than 20 hrs/week)	<b>Part Time Staff</b>
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
<b>8 hours</b>	<b>6 hours</b>	<b>4 hours</b>	<b>4 hours</b>
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
<b>12 hours</b>	<b>10 hours</b>	<b>6 hours</b>	<b>4 hours</b>

## Water

Water is required and is available at no charge to students during the lunch meal service. It was wonderful to see many students taking advantage of this option along with their reimbursable meal containing milk.

## **Food Safety and Storage**

### Food Safety Inspections

Food safety inspections were posted and available for review in the cafeteria.

### Food Safety Plans

The food safety plan was available for review.

### Storage

Syble Hopp has minimal on-site storage aside from milk in the cooler and meals in the freezer for inclement weather. The freezer shares space with other non-National School Lunch Program (NSLP) food which was somewhat disorganized. When sharing storage space with non-NSLP foods, the DPI SNT recommends to clearly label program and non-program shelving and storage. Syble Hopp is encouraged to work with their local sanitarian to organize freezer storage and develop a date-stamping method to ensure inclement weather food is discarded if not used within an appropriate timeframe.

### Temperatures

Temperatures of all cooling equipment must have the internal temperature taken and recorded daily on a temperature log. Review of temperature logs indicated temperatures were taken in the first months of school but were not taken in the last two weeks of December nor in January. Technical assistance was provided to post temperature logs directly on equipment, rather than in a log book, to ensure daily record completion. Please see the *Corrective Action* at the end of this section. Work with your local sanitarian should you have additional or site specific food safety questions.

## **Buy American**

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in school meal programs as well as supports the local economy. 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.

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.

SFAs must monitor contractor performance to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. This is accomplished by ensuring the product label designates the United States, or its territories, as the country of origin. Therefore, SFAs must ensure that products delivered comply with any Buy American contract provisions by reviewing products and/or delivery invoices/receipts to identify the country of origin is the United States or its territories. SFAs also need to conduct a periodic review of storage facilities, freezers, refrigerators, dry storage, and warehouses to ensure products comply with the Buy American provision, unless a limited exception has been approved.

The following items were found to be non-compliant during the on-site review at West DePere School District, the SFA that vends meals to Syble Hopp via joint agreement:

- Mandarin Oranges – China
- Pineapple – Indonesia
- Cucumbers – Mexico
- Broccoli (frozen) – Mexico

Both SFAs should work together with distributors to see if these products are available domestically. If they are not, documentation requested in the [Non-compliant Product List](#) should be obtained. Please note, the use of this form is the exception, not the rule.

More information on this new requirement can be found on the [DPI SNT Procurement webpage](#). Syble Hopp is encouraged to ask questions on this regulation during their Procurement Review.

### **Reporting and Recordkeeping**

Thank you for completing required USDA and DPI reports and maintaining the paperwork in an organized manner.

As a reminder, all free and reduced price applications, including applications from households denied benefits, must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain. Syble Hopp is in compliance with this record retention requirement.

### **School Breakfast Program (SBP) Outreach**

Syble Hopp does not participate in the federal School Breakfast Program (SBP).

### **Summer Food Service Program (SFSP) Outreach**

As part of the National School Lunch Program (NSLP), it is requirement to complete SFSP outreach. The purpose is to inform students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Options for outreach include informing families via email and/or newsletter about the availability of free summer meals via the [Summer Meals Map](#), the option to call 2-1-1 to connect with local health and humans services, the option to text ‘food’ to 877-877, and/or [posting free SFSP posters](#) in the SFA. For more information on Summer Food Service Program, please contact:

Amy J. Kolano, RD, CD  
Summer Food Service Program Coordinator  
Phone: 608.266.7124  
E-mail: [amy.kolano@dpi.wi.gov](mailto:amy.kolano@dpi.wi.gov)

**Finding #5:** Temperature logs were not completed for cooling equipment the last two weeks of school in December 2016 nor in January 2017.

**Corrective Action Required:** Please submit copies of 2 weeks of temperature logs along with a statement indicating how the SFA will ensure completion of the logs in the future.

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Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate webpage](#).

