

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Galesville Ettrick Trempealeau School District **Agency Code:** 612009

School(s) Reviewed: Trempealeau Elementary School

Review Date(s): April 26-28, 2017

Date of Exit Conference: April 28, 2017

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:

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, 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 the *Unpaid Meal Charges* section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Gale-Ettrick-Trempealeau School District for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information when necessary. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. It was truly a pleasure visiting the Gale-Ettrick-Trempealeau School District.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

184 eligibility determinations were reviewed, 0 errors requiring fiscal action were identified.

All free/reduced applications and the Direct Certification (DC) runs were available for review. The SFA date stamps applications and reviews them in a timely manner. Thank you to the Determining Official (DO) for being available to answer questions, clarify information and follow-up with households when necessary. The DO is knowledgeable on USDA regulations on the distribution of meal benefits, which is obvious in the review of meal applications. The DO is detail-oriented and organized, two excellent characteristics for processing and distributing meal benefits. Kudos for a job well done!

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.

Household Size Box

If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.

If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional Office, any application that does not have this box completed is considered an incomplete application.

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 recordkeeping for food service.

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 or with access to the meal benefit information, including building secretaries. This form can be found on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

Incomplete Applications

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

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 original DC run with all names blacked out except for the student(s) requesting free meals should be obtained from the previous 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.

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](#).

Direct Certification (DC)

DC runs between July 1st and Aug 10th, 2016 are incorrect as an error was noted in the system. As the error was made at the state level, no fiscal action is calculated. However, all SFAs were updated and should have notified families incorrectly matched during this timeframe. The SFA followed directions from the DPI to inform families incorrectly matched for free meals. However, one (1) student remained in free benefit status via an August 1st, 2016 DC run after the student left and re-enrolled in the district. Please see *Finding* and *Corrective Action* below that addresses this error.

Verification

The SFA completed verification within the designated timeframes. The appropriate number of applications were selected for verification based on the Alternate One sampling method. Documentation indicated a confirmation review took place by the Confirming Official (CO). No verification errors were identified.

Meal Counting and Claiming

Breakfast was observed on Thursday, April 27, 2017 at Trempealeau Elementary School. Reimbursable meals were correctly identified and claimed. No meal counting errors were documented. Technical assistance was provided during the on-site on accommodating students with special dietary needs as three (3) students were provided meal accommodations during breakfast observation.

Lunch was observed on Thursday, April 27, 2017 at Trempealeau Elementary School. Two non-reimbursable meals were observed. While both meals had the ½ cup fruit and/or vegetable, in total each meal had only two food components. Both had the taco meat and cheese (2.25 M/MA) and ½ cup strawberries, counting as two components. As discussed under the *Offer Versus Serve* section below, the observation of the non-reimbursable meals is attributed in part to the setup of the meal service line. Please see the *Finding* and *Corrective Action* below that addresses this issue.

The March 2017 claims for reimbursement for the National School Lunch Program (NSLP) and School Breakfast Program (SBP) were reviewed and validated. An over-claim of one (1) paid meal was noted for the NSLP claim for reimbursement. The over-claim was attributed to a non-school age sibling eating and being claimed at Trempealeau Elementary during March 2017. No errors were identified in the SBP claim for reimbursement. Please see the *Finding* and *Corrective Action* below that addresses the NSLP claiming error.

Finding #1: DC runs between July 1 and Aug 10, 2016 are incorrect as an error was noted in the system. As the error was made at the state level, no fiscal action is calculated. However, all SFAs were updated and should have notified families incorrectly matched during this time of the error. The SFA followed directions from the DPI to inform families incorrectly matched for free meals. However, one (1) student remained in free benefit status via an August 1, 2016 DC run.

Corrective Action Required: Please notify the household of the reduction in meal benefits, to take effect 10 days from the date they are notified in writing. Record the date the notification letter was mailed and notify DPI.

Finding #2: Two (2) non-reimbursable lunch meals were observed at Trempealeau Elementary School on Thursday, April 27, 2017. While both meals had the ½ cup fruit and/or vegetable, in total each meal had only two food components. Both had the taco meat + cheese (2.25 M/MA) and ½ cup strawberries.

Corrective Action Required: Please submit a description detailing the training and steps taken to ensure future meals are all deemed reimbursable. Please include information on how the meal service line has been altered to allow for all five food components to be available prior to the final check of the tray.

Finding #3: An over-claim of one (1) paid meal was noted for the March 2017 NSLP claim for reimbursement.

Corrective Action Required: As discussed during the on-site, non-school age children cannot be claimed for reimbursement. The SFA can serve and charge the student for a meal and should consider all costs including food, portion sizes, labor, preparation expenses, etc. when setting the price of the meal. If the portion sizes are the same size as an adult meal, the meal should be charged at the adult meal price as the SFA is receiving no reimbursement for the non-reimbursable meal.

Please submit an explanation detailing how the SFA will ensure correct claims for reimbursement in the future.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director at Galesville-Etrick-Trempealeau School District for sending all documentation ahead of time in an orderly manner. All documentation was complete and had only minor errors. Both the breakfast and lunch weeks of review were perfect, meaning no shortages or missing components and no missing or invalid crediting documentation. Great job! The MyPlate signage at Trempealeau Elementary School was visually-pleasing and professional-looking, showing what a healthy plate should look like. This encourages students to make half their plate fruits and vegetables, and establishes healthy eating habits at a young age. Students also have a great variety of menu options, which include a salad bar with lots of fresh veggies.

Galesville-Etrick-Trempealeau School District also has a school garden where they grow lots of fruits and veggies, which are used in the lunch program. This is a great opportunity for students to get hands-on learning, experience gardening, and appreciate and understand the source of their food. We love schools participating in farm to school efforts! The Food Service Director, staff, and district are doing a great job at serving healthy, nutritious meals to students.

Fruits/Vegetables

In Child Nutrition Programs, meat/meat alternate and grains are referred to in ounce equivalents (oz. eq.), in quarter oz. eq. increments; fruits and vegetables are referred to by volume, in 1/8th cup increments. A few vegetables served during the week of review were recorded by weight (i.e. 2 oz or 4 oz). These should be recorded by volume as 2 oz or 4 oz by weight of a certain vegetable does not necessarily credit as 1/4 cup or 1/2 cup, respectively.

Milk Variety

Although a variety of milk is offered daily to students at both breakfast and lunch, make sure they are recorded by type on the production records. Currently, they are being grouped together on the lunch production records.

Offer versus Serve

Staff at Trempealeau Elementary School were knowledgeable on the requirements of reimbursable meals for breakfast and lunch. However, two (2) non-reimbursement meals were observed at lunch, attributed in part to the Point of Service (POS) at the beginning of the line and the milk and chips being located immediately after the server that reviews each tray for reimbursement. As the server is working to ensure service of all students in a timely manner, it is difficult for the single individual to also ensure each student has a reimbursable meal, especially with the milk being located across the meal service line. Additionally, USDA requires that all five components be made available to each student prior to the final individual reviewing each tray. Options were discussed with the FSD, District Administrator and staff at Trempealeau Elementary for improving the flow of the meal service line while ensuring compliance with regulations. Please see the *Finding* and *Corrective Action* above under the heading *Meal Counting and Claiming* that addresses this issue.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Access to the SFA's Child Nutrition Report, which provides a compilation of meals claimed, 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](#).

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 Afterschool 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

The SFA is in compliance with PLE, having used the paid portion of state breakfast aid in previous years in lieu of raising student meal prices. The SY17-18 PLE tool was reviewed together during the on-site.

Revenue from Nonprogram Foods

The SFA flagged for a comprehensive resource management review in the *Revenue from Nonprogram Foods* section as it sells nonprogram foods. Please see the *Finding and Corrective Action* below that addresses this flag.

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
- Vending Machines operated by Food Service

All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals nor be absorbed by the food service account. Nonprogram food costs and revenues must be separated from program food costs and revenues. In regards to adult meals, 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, which are outlined in the [Wisconsin Adult Meal Pricing Worksheet](#). SFAs must reassess adult meal prices annually prior to contract submission to ensure student reimbursement is not being used to subsidize adult meals.

At a minimum, the [USDA Nonprogram Food Revenue Tool](#) must be completed yearly. The [DPI Nonprogram Food Revenue Tool/Calculator](#) aids in calculating prices of nonprogram foods and feeds into the USDA Nonprogram Food Revenue Tool to determine compliance with USDA nonprogram food regulations.

To complete the USDA Nonprogram Food Revenue Tool, the SFA must select a reference period of at least 5 consecutive operating days of a regular school week, and compare the reference period revenue ratio to the food cost ratio for the entire SFA to determine if the revenue ratio is equal to or greater than the food cost ratio (see Figure 1 below). Rather than separating all costs for the entire year (although recommended), SFAs must separate their non-program food costs from their program food costs for the selected period to complete the Tool. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance.

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

Figure 1 - Nonprogram Foods Revenue and Costs Ratio

Nonprogram food revenue is the dollar amount of nonprogram food sales sold through the nonprofit school food service account including la carte sales, adult meals, vending machines, extra/cold lunch milks, etc. Total program and nonprogram revenue includes the dollar amount from program and nonprogram food sales.

If using the DPI Nonprogram Food Revenue Tool/Calculator to complete the USDA Nonprogram Food Revenue Tool (recommended), to determine nonprogram food cost data, gather an itemization of all nonprogram foods offered during the selected reference period and enter the per item raw food cost of each nonprogram food and the number of servings/items sold in the selected reference period. For total program and nonprogram food costs, include all program and nonprogram food costs. Program food costs data should be available using production records, invoices, etc.

The [Nonprogram Foods Revenue Rule SP 20-2016](#) and the [Nonprogram Foods In a ‘Nutshell’](#) can provide additional guidance and clarification on nonprogram foods.

Finding #4: The USDA Nonprogram Food Revenue Tool was not completed by the SFA. Technical assistance was provided to the FSD during the on-site.

Corrective Action Required: Please submit a completed USDA Nonprogram Food Revenue Tool. If the Tool comes out in the red, requiring *Additional Revenue to Comply*, please submit a plan going forward for how the SFA will comply with the shortfall (i.e. raise nonprogram food prices and/or contribute non-federal funds to meet the required ratio. Please note, the SFA is encouraged to use the DPI Nonprogram Food Revenue Tool/Calculator which feeds into the USDA Nonprogram Food Revenue Tool.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Non-discrimination Statement

Materials sent to households in regards to the USDA Child Nutrition Programs contained the correct and full non-discrimination statement.

And Justice for All Poster

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

Civil Rights Training

Civil rights training had been 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 Medical Statement Form](#) posted on the [DPI SNT Special Dietary Needs webpage](#) if a student's IEP does not include language regarding accommodations for meals, as noted in the [Questions and Answers Regarding USDA Memo SP 59-2016](#). The 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 [Medical Statement 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

As a reminder, all verbal or written civil rights complaints regarding USDA Child Nutrition Programs that are filed with the SFA must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. 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. 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](#).

On-site Monitoring

The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) established the requirement to conduct on-site monitoring of the School Breakfast Program beginning in SY 16-17. The requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information, see [USDA Memo SP 56-2016](#). The [National School Lunch Program On-site Monitoring Form](#) and [School Breakfast Program On-site Monitoring Form](#) are currently available on the [DPI SNT Administrative Review webpage](#).

Lunch monitoring forms were available for all schools at the SFA. The FSD noted breakfast monitoring had been completed but the monitoring form had not yet been completed. Technical assistance was provided to ensure the [School Breakfast Program On-site Monitoring Form](#) is completed annually.

Local Wellness Policy (LWP)

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 SFAs to begin developing a revised local school wellness policy during SY 16-17 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. 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>.

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

- Food and beverage marketing guidelines should be included in the LWP, specifically noting that SFAs may only market products that adhere to Smart Snacks during the school day.
- The LWP should contain language regarding Smart Snack Standards
- Language should be included regarding the triennial assessment and how the results of the assessment will be made available to the public.

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 that were established in the Interim Final Rule (July 1, 2014). Foods and beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption. DPI's Smart Snacks "In a Nutshell" with more information can be found: [here](#).

We recommend using the [Smart Snacks Calculator](#) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save the results for your records.

The Wisconsin Department of Public Instruction (DPI) 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.

Finding #5: Currently, the PTO is selling non-compliant food to students during the school day, and not abiding by the two-week limit per the state-defined rules. The only compliant product sold by the PTO is the Minute Maid Juice Bars, which are 100% juice, frozen. The following are **non-compliant**:

1. Vanilla Flavored Ice Cream Sandwiches - Calories from saturated fat exceed 10% of the calories
2. Blue Ribbon Chocolate Vanilla Bars - Calories from fat exceed 35% of the calories and calories from saturated fat exceed 10% of the calories
3. Budget Saver Popsicles -The first ingredient is not a fruit, vegetable, dairy, protein food, or a whole grain and is therefore non-compliant
4. Blue Ribbon Fudge Bar - Calories from saturated fat exceed 10% of the calories
5. Blue Ribbon Orange Dream Bar - Calories from saturated fat exceed 10% of the calories

Corrective Action Required: Please submit a statement explaining what the district will do so that the selling of non-compliant food by the PTO comes into compliance. Please include a timeline on when this will go into effect.

Professional Standards

The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked. 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.

The SFA is in compliance with Professional Standards regulations for the SY16-17. Technical assistance was provided to the FSD to maintain a continuing education log of all staff to determine compliance with the regulation at-a-glance. The continuing education log should include the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff).

Training requirements for all staff are as follows:

	School Nutrition Program Directors* Category 1	School Nutrition Program Managers* Category 1	Full Time School Nutrition Program Staff* Category 1	Part Time School Nutrition Program Staff or Non-School Nutrition Program Staff with Job Duties Pertaining to School Nutrition Programs* Category 1 or 2
School Year 2015-16	8 hours	6 hours	4 hours	4 hours
School Year 2016-17	12 hours	10 hours	6 hours	4 hours

*Note: If hired January 1 or later, only half of the hours is required during first school year of employment.

If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment. Additionally, in terms of Professional Standards, full time is >20 hours per week while part-time is <20 hours/week.

Water

Water is required and available at no charge to students during lunch and breakfast meal services via a water pitcher with cups in the cafeteria.

Food Safety and Storage

Food Safety Inspections

The most recent food safety inspection was posted in a publically visible and readable location.

Food Safety Plan

The food safety plan was available for review. In accordance with a Standard Operating Procedure (SOP), the SFA is recommended to discuss hair restraint options with its local sanitarian. The SFA is also encouraged to discuss *Time as a Public Health Control* with the sanitarian to ensure compliance with the non-mechanically refrigerated salad bar.

Temperature Logs

All temperature logs and signed Employee Reporting Agreements were up-to-date and available for review.

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:

- Granulated Garlic Powder - China
- Mandarin Oranges – China
- Pineapple Chunks – Thailand
- Fruit Cocktail - Thailand
- Cucumbers - Mexico

The SFA should work with its distributor to determine if these products are available domestically. If 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](#). The SFA is encouraged to ask questions on this regulation during their Procurement Review.

Reporting and Recordkeeping

Thank you for completing the required USDA and DPI reports and for maintaining the paperwork in an organized manner. The SFA is meeting record retention requirements for USDA Child Nutrition Programs.

School Breakfast Program (SBP) Outreach

The SFA participates and meets promotion requirements for the 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

5. OTHER FEDERAL AND STATE PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Claim documentation was reviewed for the WSDMP operated in SY 15-16. No issues were noted in the claim for reimbursement. The follow reminders are standard for operation of the program.

- Schools must serve Wisconsin-produced milk. Please verify this with your distributor and include in your milk bid.
- Students of paid meal status that take milk during the operation of the WSDMP cannot be claimed in the program and must be assessed a charge for the milk. If the SFA wishes to provide milk to paid students free of charge, it can but the cost cannot be absorbed by the food service account. A transfer from an outside fund (i.e. SFA’s General Fund/Fund 10) to the non-profit food service fund (Fund 50) would need to be completed.

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](#).

