

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Osseo-Fairchild School District **Agency Code:** 614186

School(s) Reviewed: Osseo-Fairchild High School

Review Date(s): March 20-22, 2017

Date of Exit Conference: March 22, 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:

- 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 Osseo-Fairchild School District for the courtesies extended during the on-site review. 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 Osseo-Fairchild School District.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

199 eligibility determinations were reviewed, 0 errors were identified. 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 detail-oriented and organized, two excellent characteristics for processing and distributing meal benefits. Kudos for a job well done!

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. This form can be found on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

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 for more information and approval.

The SFA currently date stamps all applications but has not applied for the flexibility as it has been successful in processing applications received during the school year on the same day. The SFA is encouraged to consider applying for this flexibility as a safe guard for approving applications in a timely manner.

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 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.

Verification

The SFA completed verification within the designated timeframes. The appropriate number of applications were selected for verification based on Standard Sampling. 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 Tuesday, March 21, 2017 at Osseo-Fairchild High School. Reimbursable meals were correctly identified and claimed. No meal counting errors were observed.

Lunch was observed on Tuesday, March 21, 2017 at Osseo-Fairchild High School. Reimbursable meals were correctly identified and claimed. No meal counting errors were observed.

The February 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. 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: An over-claim of one (1) paid meal was noted for the NSLP claim for reimbursement. The over-claim appears tied to a cash sale entered at one of the elementary schools. Fiscal action will be calculated on this claiming error.

Corrective Action Required: Please submit an explanation detailing the reason for the over-claim and how the SFA will ensure correct claims for reimbursement in the future.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Thank you to the Food Service Director (FSD) for her complete and timely submission of all needed materials. It is evident she has a firm grasp on the National School Lunch Program and School Breakfast Program and offers a menu with a variety of foods and flavors. Her breakfast menu offers options that cater to students who are on the go, which gives the high school students an opportunity to receive a balanced meal before beginning their daily curriculum. She is proactive with training for both herself and her staff and continues to be an advocate for school nutrition and the health of Wisconsin students. She is a great asset to Osseo-Fairchild School District and I hope her knowledge and passion do not go overlooked.

Technical Assistance and Compliance Reminders

As stated previously, the FSD is well-versed in school meal regulations and no findings related to Section 3 of the Administrative Review were found. As with all SFAs, we recommend continued training by participating in this summer's School Nutrition Skills Development Courses (SNSDC). We offer a variety of updated and new 2-, 4, or 8-hour courses which will help satisfy Professional Standards requirements and provide a great networking opportunity for staff. Dates, locations, course descriptions, and registration posted on the [DPI SNT Training webpage](#).

Offer versus Serve

Staff at Osseo-Fairchild High School were knowledgeable on the requirements of reimbursable meals for breakfast and lunch. Students were requested to return to the service line to select missing components. Staff were able to explain charging processes for extra entrees and non-reimbursable meals along with the district's negative balance policy. Technical assistance was provided at breakfast for the SFA to clearly inform students on the number of whole clementine students must take to equal ½ cup. Per the [USDA Food Buying Guide](#), one clementine equals 3/8 cup fruit.

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](#).

Thank you to the SFA for timely review and update of discrepancies noted in the SY 14-15 Annual Financial Report.

The SFA flagged for a comprehensive resource management review in the *Nonprofit School Food Service Account* section as its ending fund balance from SY 15-16 was greater than three (3) months of operating expenses. Discussions during the on-site regarding the SFA's projected food service purchases have indicated to DPI that the SFA is working to bring its ending fund balance below three (3) months of operating expenses.

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](#).

Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](#). 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 of non-federal funds must be made 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. Discussions were had during the on-site regarding the SFA's potential to apply for a PLE exemption for SY 17-18.

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.

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. 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. 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.

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

Figure 1 - Nonprogram Foods Revenue and Costs Ratio

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

The SFA partially completed the DPI Nonprogram Food Revenue Tool/Calculator using projections rather than data from a 5-day reference period. Discussions with the FSD regarding nonprogram food pricing strategies and the SFA’s means for breaking out program and nonprogram revenues and expenses on the Annual Financial Report indicate the SFA is likely in compliance with the nonprogram food regulations. However, to ensure compliance and as the Tool was partially completed, a *Finding* and *Corrective Action* is noted below that requests completion of the USDA Nonprogram Revenue Tool to ensure compliance. Please note, while USDA has noted on question 11 of [SP 20 – 2016](#) that catering costs and revenues during the reference period do not need to be included due to potential complexities of accounting for food cost and revenues, the SFA is highly encouraged to include catering to obtain a clear understanding of their compliance with the nonprogram food regulations. If the revenues from these activities are not included in the Tool, the SFA must be able to provide proper documentation, such as purchase agreements and/or invoices demonstrating the recovery of the full costs.

Finding #2: The USDA Nonprogram Food Revenue Tool was partially completed by the SFA.

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 for this *Corrective Action*, which feeds into the USDA Nonprogram Food Revenue Tool.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Nondiscrimination Statement

The SFA uses template letters from its software system which match the DPI template letters and contain the required information for approval and denial of benefits. The SFA is reminded that the [USDA non-discrimination statement](#) must be in the same size font as the most commonly used text in the document. When space is limited, such as on printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**”

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](#). 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 [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](#).

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. Note, the assessment should determine compliance with the LWP, how the LWP compares to model policies, and process made in attaining the goals of the LWP. The assessment is not a simply a review and approval of changes to the LWP.

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](#).

Breakfast and lunch monitoring forms were available for all schools in the SFA

Smart Snacks

Smart Snack regulations went into effect on July 1, 2014 apply to all food and beverage items sold to students during the school day, with the school day being designated as midnight the night before until 30 minutes after the end of the school day. This includes foods sold through fundraisers with intended consumption during the school day (i.e. frozen pizza fundraisers would not be included as consumption is intended outside of the school day).

Since Smart Snack regulations apply to the entire school, it is important that all involved with the sale of food and beverage items, not just the food service department, be involved in monitoring and complying with the regulations. Involvement of school administration is highly recommended and encouraged. It is important to remember that the goal of Smart Snacks is not to regulate what student can and can't have but is in place to build healthy school environments and teach valuable life nutrition skills to all students.

The DPI SNT has developed several resources to assist schools and districts in meeting these regulations including a [Compliant Fundraiser Tracking Tool](#), an [Exempt Fundraiser Tracking Tool](#), a [Smart Snacks Tracking Tool](#), a [Smart Snacks in a Nutshell handout](#), and a [Smart Snacks – Strategies for Success handout](#). Please visit the [DPI SNT Smart Snacks website](#) for more information.

The SFA was determined to be in compliance with Smart Snack regulations, both in regards to daily food sales and food fundraisers.

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.

Training requirements for all staff are as follows:

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

If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

The SFA provides yearly and on-going training throughout the school year. Documentation is well organized and all staff have met continuing education requirements for SY 2016-2017. The SFA is reminded that in regards to 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 service. Water was available at lunch and breakfast via three drinking fountains in the cafeteria.

Food Safety and Storage

Food Safety Inspections

The most recent food safety inspection was posted in the prep kitchen. It is a requirement of USDA Child Nutrition Programs that the most recent food safety inspection be posted in a publically visible and readable location. Please see the *Finding* and *Corrective Action* below that addresses this issue.

Food Safety Plan

The food safety plan was available for review. The FSD indicated it is reviewed and updated annually every October. The FSD is encouraged to document when this review takes place each year.

Temperature Logs

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

Storage

On-site storage areas were reviewed, including the freezer, refrigerator, and dry goods storage room. All were orderly and clean.

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 item were found to be non-compliant during the on-site review:

- Mandarin Oranges – China
- Grape Tomatoes – 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

The SFA participates in the Summer Food Service Program and meets promotion requirements for the program as part of participation in the National School Lunch Program (NSLP).

Finding #3: The most recent food safety inspection was not posted in a publically visible and readable location.

Corrective Action Required: Please submit a statement detailing the publically visible and readable location of the most recent food safety inspection. Alternatively, a photo with description of the location can be submitted.

5. OTHER FEDERAL AND STATE PROGRAMS REVIEWS

Afterschool Snack Program

Afterschool Snack Program (ASP) production records, along with the claim for reimbursement, were reviewed for the month of February 2017. It was noted that popcorn was served and claimed on February 21, 2017. Popcorn is not creditable in USDA Child Nutrition Programs and therefore these snacks claimed in error will need to be included in fiscal action calculations. Furthermore, it was noted that athletic teams were served and claimed in the ASP on days when no overarching educational programming was occurring. While USDA has relaxed the guidance in recent years to allow athletics teams to participate in the ASP, these teams can only participate and be claimed *if* the school has an overarching, educational program offered on the same day. For example, if a school has homework club (educational program), an athletic team could drop by, receive and be claimed in the ASP. However, on days when there is no overarching, educational programming, the athletic team could not receive a snack and be claimed in the ASP. Please see the *Findings* and *Corrective Actions* below that address these issues.

Finding #4: Popcorn was served and claimed in the ASP on February 21, 2017. Popcorn is not creditable in USDA Child Nutrition Programs.

Corrective Action Required: Please submit a statement noting the SFAs understanding that popcorn is not creditable in USDA Child Nutrition Programs.

Finding #5: School athletic teams were served and claimed in the ASP on days when no overarching, educational programming was occurring.

Corrective Action Required: Please review February 2017 production records and indicate which activities were claimed on each day in February. Snacks served to school athletic teams on days when no overarching, educational programming was occurring will be included in fiscal action calculations. Please submit a summary detailing the SFAs understanding of when athletic teams can be claimed in the ASP and how the SFA plans to move forward with the ASP.

Wisconsin School Day Milk Program (WSDMP)

While operated by the SFA, this program was not reviewed as it is located in the elementary schools. Osseo-Fairchild High School was the School of Focus for the Administrative Review.

Program reminders for the WSDMP include:

- Schools must serve Wisconsin-produced milk. Please verify this with your distribution 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 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](#).

