

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

School Food Authority: Northland Pines School District Agency Code: 63-1526

School(s) Reviewed: Northland Pines High School, SOAR High School

Review Date(s): 12/10-11/18

Date of Exit Conference: 12/11/18

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 Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Northland Pines 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. 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- Of the 607 students eligible for free or reduced price meals in the month of November, a sample of 304 students was pulled for review, and all were approved correctly! Kudos for a job well done!

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable, but these verifications are not considered part of the Verification sample. For more information, refer to the current [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** The applications chosen for verification did not have the confirming official signature recorded on the back of the application.

Corrective Action Needed: Please provide a statement that going forward all applications chosen for verification will be confirmed and have recorded on the back of the application the confirming official signature.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Only one meal per student may be claimed as a reimbursable meal.
- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals every school day (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning). Field trip meals must be charged to the student at the time of delivery of the reimbursable meal. If students do not come to cafeteria to pick up field trip meals, they must be checked off as the student receives the meal.
- For FSMC operated districts, monthly edit checks must be reviewed by the SFA’s authorized representative each month and signature-approved before claim submission, even if the edit check is done by the POS software.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

Thank you to the staff of Northland Pines School District for their time and cooperation during the Administrative Review. Thank you to the Food Service Director for providing documentation prior to the on-site review. During lunch service, it was observed that students had the opportunity to enjoy

local apples and lettuce. This is a great incentive and excellent addition to the National School Lunch Program. Thank you for your hard work and dedication to your School Nutrition Programs.

Technical Assistance:

Dietary Specifications

For Northland Pines High School and SOAR High School the maximum ounce equivalents (oz eq) of weekly grain and weekly meat/meat alternates offered exceeded the maximum guidelines for the week of review, November 12-16, 2018. While maximums are not currently being enforced, the maximums are in place as a guideline for dietary specifications. If schools meet the minimum weekly requirements for grain and meat/meat alternate and do not exceed the maximum requirements, dietary specifications should be within the guidelines for 9-12 students provided on the [Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>).

A salad bar with meat/meat alternate and grain option is offered daily in addition to the main entrees. The salad bar is intended to be an alternate entrée option. In addition to the main entrée choices, students are able to select additional meat/meat alternate and grain from the salad bar, without restriction. Therefore, students were able to select the maximum quantities during the week of review described below.

The maximum amount grains offered during the week of review for Northland Pines High School and SOAR High School was 16.75 oz eq grain. The guideline for the grain maximum for the 9-12 meal pattern is 12.00 oz eq grain. The maximum amount of meat/meat alternate offered during the week of review for Northland Pines High School and SOAR High School was 28.50 oz eq meat/meat alternate. The guideline for the meat/meat alternate maximum is 12.00 oz eq meat/meat alternate. The minimum amount of meat/meat alternate offered during the week of review was 21.25 oz eq meat/meat alternate, but the minimum meat/meat alternate requirement is 10.00 oz eq meat/meat alternate.

The Weekly Nutrient Calculator can be used to analyze calories, saturated fat, and sodium values weighted over the week. When analyzing nutrients, remember that the values must be weighted according to popularity (how the menu planner plans for each item to be selected). This tool can quickly show both high and low menu items, as well as high or low days on the menu, making it quick to determine which days could be mixed and matched throughout the month. This tool can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage, under Menu Planning Tools (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools>). The 5-day version should be used for Northland Pines High School and SOAR High School.

Condiments

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Condiment usage is not monitored nor are portion sizes communicated to Northland Pines High School and SOAR High School students. Please monitor student's condiment usage and communicate appropriate portion sizes to students. Some strategies to promote appropriate serving sizes include adding signage at the condiment station with a photo of what one tablespoon of ranch dressing or ketchup looks like, adding signage to the bins of pre-packaged condiments indicating how many packets make up a portion size, or purchasing single-use, one ounce cups to aid in portion control with pumps.

Standardized Recipes

During lunch meal preparation observation, it was observed that there was a substitute for the day of the on-site review. There were not recipes readily available for the substitute to follow. Another school nutrition professional was able to get recipes printed and provide the substitute with more guidance.

Standardized recipes should be readily available and followed by all school nutrition professionals. Following standardized recipes ensures consistent products, quality, and crediting. Please ensure standardized recipes are available in the preparation area and are followed by all school nutrition professionals.

Breakfast Participation

Northland Pines School District offers traditional breakfast before the school day in the cafeteria and second chance breakfast in the hallways of Northland Pines Middle School and High School. The Food Service Director reports that participation has increased since implementing the second chance breakfast model. Excellent work!

However, it was observed that most students who participated in breakfast did not make a reimbursable meal out of their breakfast and were charged a la carte. It appeared that most students did not understand that three food items, one of which is $\frac{1}{2}$ cup fruit, vegetable, or combination, make up a reimbursable meal. Many students were selecting two or more food items but were not selecting $\frac{1}{2}$ cup fruit or $\frac{1}{2}$ cup juice in order to make the meal reimbursable.

Technical assistance was provided to the Food Service Director regarding educating students about what makes up a reimbursable meal. Signage was discussed as well as other means to communicate what makes up a reimbursable breakfast to students.

Breakfast Signage – Food Items

Under Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered, but only three food items, one of which is $\frac{1}{2}$ cup fruit, vegetable, or combination, must be selected in order for the meal to be reimbursable. A food item is defined as 8 fluid ounces (fl oz) of milk; $\frac{1}{2}$ cup of fruit (or $\frac{1}{2}$ cup of vegetable can be substituted for fruit) and 1.00 oz eq of grain (or 1.00 oz eq of meat/meat alternate can be substituted for grain, after 1.00 oz eq of grain has been offered for the day).

Breakfast signage is an excellent way to communicate to students what they are able to select as part of the reimbursable meal. While breakfast signage was present, it was not completely clear. Technical assistance was provided to the Food Service Director during the on-site visit regarding breakfast meal pattern, breakfast OVS, and how to fill in DPI SNT OVS breakfast signage. Printable OVS breakfast signage can be found on the DPI SNT [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Breakfast Options

One and/or two Rice Krispies Treats in two different flavors were a breakfast entrée every day during the review week. While these are similar to cereal bars, they are typically considered to be treats or desserts and are not encouraged as a breakfast entrée. Consider serving plain Rice Krispies cereal, other ready-to-eat cereals, or a different grain item more suitable as a breakfast entrée.

Salad Bar Signage

Almost all foods on the salad bar for Northland Pines High School and SOAR High School service are selected using tongs. Planned portion sizes are indicated on production records, however, students do not know what the planned portion size is for certain foods on the salad bar. If a portioning utensil

cannot be used to serve certain salad bar items, signage indicating the planned portion size can be helpful. Consider adding signage with pictures of what the planned portion size of meat/meat alternates and vegetables looks like. Examples of more signage and printable signage can be found on DPI SNT's [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage under the Salad Bar Signage heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Findings and Corrective Action Needed for Meal Pattern and Nutritional Quality:

❑ **Finding #1:** The age/grade groups served in the Northland Pines Middle and High School cafeteria include grades 7-12 from Northland Pines Middle School, Northland Pines High School, and SOAR High School. The 9-12 meal pattern is served to the 7-12 students. This is unallowable. Technical assistance was provided regarding this situation a few months prior to the on-site review. No changes were made prior to the on-site review.

There is no overlap in dietary specifications (calories, saturated fat, and sodium) for students in grades 7-8 and those in grades 9-12. This means grades 7-12 cannot follow the 9-12 meal pattern.

The 7-8 students must follow the 6-8 or K-8 meal pattern and the 9-12 students must follow the 9-12 meal pattern. If grades cannot be separated during meal service, consider posting signage instructing students what portion sizes are needed for their grade level, making different size spoodles available when needed, and using different cafeteria lines or colored trays for varying grade groupings.

In addition, OVS implemented at lunch for all 7-12 students. OVS requirements are different for these two age/grade groups. A full component for the 6-8 and K-8 meal pattern is 1.00 oz eq of grain, 1.00 oz eq meat/meat alternate, ½ cup fruit, ¾ cup vegetable, or 1 cup of milk. A full component for the 9-12 meal pattern is 2.00 oz eq grain, 2.00 oz eq meat/meat alternate, 1 cup fruit, 1 cup vegetable, and 1 cup milk. Therefore, 7-8 students are currently being required to select more than they have to in order to have a reimbursable meal.

Corrective Action Needed: Submit a written statement detailing Northland Pines School District's action plan for how the 6-8 or K-8 meal pattern plans to be implemented for the 7-8 students. Explain how OVS will be implemented for 7-8 and 9-12 students, detailing how the point of service will know what age/grade group each student is in to determine OVS requirements. In this statement, indicate understanding that students that are not in grades 9-12 are not allowed to be served the 9-12 meal pattern due to differing dietary specifications, daily and weekly meal pattern requirements, and OVS requirements.

❑ **Finding #2:** Breakfast and lunch production records did not have the following information filled in or were missing the following categories based on the [Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) ("Must Haves and Nice to Haves") (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>):

- Planned number of servings for each menu item
- Planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb case, 2-96 count case)
- Amount leftover for all items on production record
- Milk usage by each type (or a [milk recipe](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/milk-recipe-instructions.pdf) can be used and total milk usage can be recorded) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/milk-recipe-instructions.pdf>)
- Planned serving size and usage for condiments and any extra menu items
- Number of reimbursable and non-reimbursable (adult) meals planned and served
- Substitutions made for students with special dietary needs

While there is no required production record template, there are some examples that may be used on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

In addition, it is important to be specific on production records about the identity, brand, and description of the items served. Instead of “cereal, assorted”, list all types/flavors of cereal separately. “Cereal” does not indicate exactly what was served. Fruit sizes (e.g. case count) should also be recorded.

The point of service staff also indicated that a peanut butter and jelly sandwich is a daily entrée option at breakfast. The peanut butter and jelly sandwich is not listed on breakfast production records. It is required that all foods offered as part of the reimbursable meal are recorded on production records.

Corrective Action Needed: Submit one week of completed production records for Northland Pines High School K-12 breakfast and Northland Pines High School and SOAR High School 9-12 lunch with all of the production record “Must Haves” listed and filled in.

❑ **Finding #3:** Documentation provided for the week of review for Northland Pines High School and SOAR High School demonstrated a missing grain component for the salad bar entrée option on Friday. It is required that all five components be offered daily in their required quantity.

Corrective Action Needed: Submit a written statement explaining how the 9-12 grain component daily 2.00 oz eq grain requirement at lunch for the week of review will be met and your plan for ensuring the grain component is offered for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

Additionally, fiscal action is required for any missing component violations. Therefore, fiscal action will be assessed. Per pages 79-80 of the Administrative Review Manual, fiscal action must be assessed when a meal component is missing. Due to the SFA not recording how many entrée salads were served on Friday, there will be a reclaim of all meals on Friday for Northland Pines High School (155 meals) and SOAR High School (8 meals), not to be duplicated with fiscal action in Finding #5.

Please note, missing component violations during subsequent Administrative Reviews will result in fiscal action.

❑ **Finding #4:** Documentation provided for the week of review for Northland Pines High School and SOAR High School demonstrated daily grain shortages at lunch on Monday, Tuesday, Wednesday, Thursday, and Friday. On Monday-Wednesday, the minimum amount of grain offered was 0.50 oz eq of croutons with the salad bar entrée. On Monday and Tuesday, a total of 1.50 oz eq of grain were offered with the blueberry yogurt parfait with the croutons on the salad bar. On Wednesday, a total of 1.50 oz eq of grain were offered with the blueberry and strawberry yogurt parfait with the croutons on the salad bar. On Thursday, the minimum amount of grain offered was a 1.00 oz eq dinner roll with the salad bar entrée. On Friday, a total of 1.00 oz eq grain was offered with the strawberry yogurt parfait. The daily grain requirement for the 9-12 meal pattern is 2.00 oz eq grain.

Please see **Finding #5** for more information on the minimum amount of grain offered at lunch each day during the week of review.

Corrective Action Needed: Submit a written statement explaining how the 9-12 daily 2.00 oz eq grain requirement at lunch for the week of review will be met and your plan for ensuring the minimum grain

requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

Please note, repeat violations of a daily grain shortage during subsequent Administrative Reviews may result in fiscal action.

□ **Finding #5:** Documentation provided for the week of review for Northland Pines High School and SOAR High School demonstrated a weekly grain shortage at lunch. The following entrees contained the minimum amount of grain offered on each day during the week of review:

- Monday-Wednesday: Croutons on salad bar for salad bar entrée = 0.50 oz eq grain
- Thursday: Dinner roll on salad bar for salad bar entrée = 1.00 oz eq grain
- Friday: Missing grain component, as explained in **Finding #3**

The minimum amount of grain offered each day over the course of the week of review totaled to 2.50 oz eq grain. The weekly grain requirement for the 9-12 meal pattern is 10.00 oz eq grain. Please see **Finding #4** for more information on daily grain shortages that also lead to a weekly grain shortage.

Corrective Action Needed: Please see **Finding #4** for corrective action needed. Meeting the daily 2.00 oz eq grain requirement will meet the weekly 10.00 oz eq grain requirement.

Additionally, fiscal action is required for any repeat weekly grain shortage violations from the previous Administrative Review. Therefore, fiscal action will be assessed. Per page 81 of the Administrative Review Manual, there will be a reclaim of meals. For weekly shortages, meals are reclaimed either on the specific day for the specific menu option causing the shortage or meals are reclaimed for the specific menu option on the day with the lowest participation if there is more than one day causing the shortage. Since the number of entrée salads is not recorded, fiscal action will be assessed, but not duplicated with fiscal action in Finding #3, for all meals on Friday for Northland Pines High School (155 meals) and SOAR High School (8 meals). The following repeat finding was documented from the School Year (SY) 2014-15 Administrative Review:

- **“Grades 6-8 weekly grains are not met due to the yogurt parfait.”**

Please note, repeat violations of a weekly grain shortage during subsequent Administrative Reviews may result in fiscal action.

□ **Finding #6:** During the day of on-site meal observation, 12 non-reimbursable meals were observed at Northland Pines High School and SOAR High School lunch that were marked as reimbursable meals by the point of service.

One meal did not contain three full components. The student selected pasta (1.00 oz eq grain), ¼ cup marinara sauce, and 1 cup of milk.

Eleven meals did not contain the required ½ cup of fruit, vegetable, or combination under OVS. A majority of the eleven meals only contained ¼ cup of marinara sauce, the planned portion size for the marinara sauce that went with the chicken parmesan entrée for the day.

Corrective Action Needed: Submit a written statement explaining how these errors will be corrected and avoided in the future.

Fiscal action will be assessed for these 12 non-reimbursable meals.

□ **Finding #7:** During the day of on-site meal observation, three non-reimbursable meals were observed at Northland Pines High School second chance breakfast service that were marked as reimbursable meals by the point of service.

All three non-reimbursable meals did not contain the required ½ cup fruit, vegetable, or combination under OVS.

Corrective Action Needed: Submit a written statement explaining how this error will be corrected and avoided in the future.

Fiscal action will be assessed for these 3 non-reimbursable meals.

❑ **Finding #8:** The Food Service Director reports that point of service staff have been trained on OVS for both breakfast and lunch. On-site observation indicated that staff have an understanding of OVS, however, additional training would be beneficial, especially on breakfast options. Additionally, OVS training will be needed for the 6-8 or K-8 meal pattern as explained in **Finding #1**. All point of service staff and school nutrition professionals that are substitutes for point of service staff from time to time are required to be trained on OVS.

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

During breakfast meal observation at Northland Pines High School, for both early morning and second chance breakfast, it was observed that the point of service staff did not understand that there was a limit on food items that can be selected as part of the reimbursable meal. The way the menu planner intends a reimbursable meal to be selected is a maximum of two food items from the grain/meat/meat alternate component. The menu planner explained that students can select one menu item that counts as two food items from the grain component, such as the 2.00 oz eq Benefit Bar or 2.00 oz eq Pop-Tart, or students can select two-one food item grain options, such as a 1.00 oz eq cereal, cereal bar, or Pop-Tart, or students can select one-one food item grain options and one-one food item meat/meat alternate options, such as 1.00 oz eq yogurt or 1.00 oz eq cheese stick. Student can select all fruit options but cannot duplicate juice and select one milk as part of the reimbursable meal. Anything outside these options must be charged a la carte.

Point of service staff were inconsistent with charging students a la carte appropriately. This is due to a misunderstanding of what can be selected as part of the reimbursable meal.

Corrective Action Needed: Submit a brief explanation on how OVS training plans to be conducted for school nutrition professionals and point of service staff. Submit a signed training roster after training has been completed.

❑ **Finding #9:** While signage is present for breakfast and lunch, signage does not include the required OVS statement that students must select ½ cup fruit, vegetable, or combination.

Instead, lunch signage say, “Make 1 of 3 a fruit or vegetable (½ cup minimum).” Breakfast signage says, “Students may select ½ cup fruit and/or 100% juice.” Both of these statements do not indicate that selecting ½ cup of fruit, vegetable, or combination is required under OVS.

If you are interested in ordering free signage, please visit the [Team Nutrition](#) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

Examples of signage can be found and printed from our [Signage Resources](#) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Corrective Action Needed: Submit a picture or PDF of new or supplemental signage that has been posted that includes the required OVS statement that students must select ½ cup fruit, vegetable, or combination.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

Allowable Costs

- 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. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found on our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

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"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- Finding #1:** The revenue reported for Wisconsin School Day Milk Program only
Corrective Action Needed: Please resubmit your Annual Financial Report before December 31, 2018 to correct the WSDMP reporting.
- Finding #2:** The district's written unpaid meal charge policy states that students may be permitted to accumulate negative balances as determined by the District Administrator. Because an exact amount is not stated, this could be construed as a civil rights violation if applied ambiguously.
Corrective Action Needed: Update the written unpaid meal charge policy to be specific and distribute update to households.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be

supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).
- All extra entrees or breakfast items in addition to the reimbursable meal must be charged to students as nonprogram foods and meet the nonprogram foods revenue rule.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** The nonprogram food revenue tool submitted did not include all nonprogram foods as coffee, juice cup, and breakfast entrees were missing.
Corrective Action Needed: Please resubmit the nonprogram foods revenue tool including all nonprogram foods sold in the district.
- ❑ **Finding #2:** Coffee is given to district staff free of charge which is not an allowable cost under the nonprogram food revenue rule. All foods given to staff, other than program staff, must have the entire cost covered by a nonfederal source.
Corrective Action Needed: Please submit a plan as to how the entire cost of free coffee for district staff will be tracked and reimbursed back to the nonprofit school food service account.
- ❑ **Finding #3:** Extra entrée items, in addition to the breakfast reimbursable meal, are not being charged for at the point of service.
Corrective Action Needed: Please provide a statement as to how all nonprogram foods will be charged and accounted for to students.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the 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.

Processes for complaints

- All SFAs should have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** The USDA Nondiscrimination full Statement is not in the back-to-school bulletin.
Corrective Action Required: Please provide a statement that the correct USDA long statement will be included in the back-to school bulletin.
- ❑ **Finding #2:** The process for receiving discrimination complaints does not reference the USDA requirements for submission. To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online (http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form.
Corrective Action Required: Please submit a revised complaint procedure to include the above USDA requirement.

Onsite Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

- Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year, and may not be delegated to the FSMC. It is due February 1 annually and the documents are kept onsite.

Findings and Corrective Action Needed: Onsite Monitoring

- ❑ **Finding #1:** The onsite monitoring was completed by the FSMC food service director which is not allowed as this process may not be delegated to the FSMC employee.
Corrective Action Required: Please have Authorized Representative complete all Onsite Monitoring by February 1, 2019 and submit completed forms as corrective action.

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](#). This can be accessed electronically (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)

- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).
- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Wellness Policy

- **Finding #1:** SFA LWP meets some but not all requirements as stipulated above SFA policy states that it will develop nutrition guidelines but does not state what those guidelines are.

Corrective Action Required: Please provide a timeline for updating the above items in your policy to become compliant with the final rule.

Smart Snacks

Compliance Reminder:

Final Rule

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Fundraisers

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt

fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; SFAs have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Technical Assistance:

Beverages

If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie (≤ 5 kcal/fl oz) flat or carbonated, or no-calorie beverages (< 5 kcal/8 fl oz; ≤ 10 kcal/20 fl oz) flat or carbonated beverages are unallowable. More information on beverage and food standards can be found on the DPI SNT [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) handout (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf>).

Findings and Corrective Action Needed for Smart Snacks:

❑ **Finding #1:** Beverages sold a la carte by food service and beverage vending machines, not operated by food service, contain non-compliant beverages for the youngest grade group, middle school. Beverages must meet Smart Snacks standards for the youngest grade group that has access. No-calorie, low-calorie (≤ 5 kcal fl oz), and caffeinated beverages are not allowable for middle school students under the Smart Snacks regulations.

The only beverages that are allowed to be sold to students during the school day under Smart Snacks are all sizes of plain water, ≤ 12 fl oz low-fat or fat-free flavored or unflavored milk, and ≤ 12 fl oz 100% juice.

Corrective Action Needed: Submit a written statement detailing Northland Pines School District's action plan and timeline for bringing both the beverage vending machines and a la carte beverages into compliance with the Smart Snacks regulations.

❑ **Finding #2:** One of the beverage vending machines, not operated by food service, contains regular soda, which is non-compliant for all grade groups under the Smart Snacks standards. The vending machine indicates it is turned off until 16:00, 30 minutes after the instructional day. However, the vending machine was available to students when they were dismissed from the instructional day at 3:25 pm. It appears that the clock on the vending machine was not changed with daylight savings.

Corrective Action Needed: Submit a written statement detailing Northland Pines School District's action plan and timeline for bringing this beverage vending machine into compliance with the Smart Snacks regulations.

❑ **Finding #3:** Coffee is sold a la carte at breakfast with accompaniments (cream and sugar) to middle and high school students. Caffeinated beverages are not allowed to be sold to middle school students under the Smart Snacks regulations.

Northland Pines School District also has not taken into account the accompaniments that are sold with the coffee. Accompaniments need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar need to be added together when determining if the beverage meets the guidelines below.

Beverage Guidelines:

- Calorie-free beverages (for black coffee only)
 - <5 calories per 8 fl oz; ≤10 calories per 20 fl oz
 - Maximum serving size: 20 fl oz

- Low-calorie beverages (for coffee with cream and/or sugar)
 - ≤40 calories per 8 fl oz; ≤60 calories per 12 fl oz
 - Maximum serving size: 12 fl oz

To help determine if coffee drinks are compliant, utilize the [Alliance for a Healthier Generation's Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) (https://foodplanner.healthiergeneration.org/calculator/). If they are, you will be able to print a reference sheet showing compliance directly from the website as record keeping documentation.

Corrective Action Needed: Submit a written statement detailing Northland Pines School District's action plan and timeline for bringing coffee and accompaniments into compliance with the Smart Snacks regulations. If choosing to continue to serve coffee and accompaniments only to the 9-12 students, explain in detail the way Northland Pines School District will be able to determine what grade students are in. In addition, submit the Smart Snacks Product Calculator print out, indicating coffee and accompaniments are in compliance and an explanation as to how Northland Pines School District will convey information on accompaniments to students.

❑ **Finding #4:** A la carte snack food options and vending machine foods, operated by food service, contain compliant products. However, in the vending machine two or more foods/beverages are bundled together to be purchased at one price. This practice is not allowable under the Smart Snacks regulations as all individual food items sold must meet the Smart Snacks general standards and nutrient standards individually and must be sold individually, not bundled. Beverages must individually meet the beverage standards for the appropriate grade group and must be sold individually, not bundled with other foods or beverages.

Corrective Action Needed: Submit a written statement detailing Northland Pines School District's action plan and timeline for bringing the food vending machine, operated by food service, into compliance with the Smart Snacks regulations.

❑ **Finding #5:** Second meals are being bundled and sold at one price. This is not allowable under the Smart Snacks regulations.

All of the items in the meal must meet the Smart Snacks standards individually and be sold individually. Entrée items are exempt from the Smart Snacks standards on the day of and day after they are offered as part of the National School Lunch Program or School Breakfast Program. Therefore, second entrées may be purchased, even if they do not meet the standards. However, bundling of the entrées and the side items is not exempt under Smart Snacks. A second meal cannot be sold as a unit since the unit would not meet the standards.

There are situations for some foods where meeting the standards would not be a concern. Milk types that are allowable with reimbursable meals are allowable at all grade levels under Smart Snacks. Fresh, frozen, and canned fruits or vegetables with no added ingredients except water or juice, extra light syrup, or light syrup (in the case of canned fruit) are exempt from the Smart Snacks standards and do not need to be evaluated further. Therefore, items that will need to be analyzed include grain-based sides (i.e. rice, stuffing, pasta salad, bread sticks), vegetables cooked with fat, extra items (i.e. baked chips, pretzels) and desserts.

Corrective Action Needed: Submit a written statement indicating understanding that second meals cannot be bundled and sold at a unit price and that this practice will be discontinued. In the statement, indicate understanding that all items must be charged individually a la carte and be compliant under the Smart Snacks regulations.

❑ **Finding #6:** There is a tracking system in place for fundraisers at all schools. All schools are to bring fundraisers to the Food Service Director for approval and the Food Service Director will track them. When looking at past fundraiser tracking forms, some of the fundraisers exceeded the two consecutive week maximum.

Corrective Action Needed: Submit a written statement indicating understanding that Wisconsin allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each.

Commendations/Comments/Technical Assistance/Compliance Reminders

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

Training Requirements

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

- **Annual Training Requirements for All Staff**
Directors: 12 hours
Managers: 10 hours
Other Staff (20 hours or more per week): 6 hours
Part Time Staff (under 20 hours per week): 4 hours

Findings and Corrective Action: Professional Standards

- ❑ **Finding #1:** Training is not being monitored on a tracking tool.
Corrective Action Needed: Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety

- The most recent food safety inspection must be posted in a publically visible location.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.

Time/Temperature Control for Safety (TCS) Food

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

Time as Public Health Control

- When using "Time as a Public Health Control:"
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time

- limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration or heat during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ✓ **Finding #1:** Most recent food safety inspection not posted in a publically visible location at highschool.
Corrective Action Needed: Please post the most recent food safety inspection in a publically visible location outside of the kitchen. **Corrected on site. No further action required.**
- **Finding #2:** Because hot items are held outside of mechanical heating and cold items are held outside of mechanical refrigeration during second chance breakfast, Time as a Public Health Control must be used.
Corrective Action Needed: Please develop a Time as a Public Health Control SOP and submit updated SOPs as attachment via email.

Buy American

Compliance Reminders:

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

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation. SFAs must monitor contractor performance, to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Technical Assistance:

Non-Compliant Products Found On-site

The following products identified in Northland Pines School District's storage did not have proper labeling to identify the country of origin:

- Pop-Tarts- distributed by Kellogg Sales Co.
- Crackers- distributed Mondelez Global, LLC
- Hoisin sauce- packed by Lee Kum Kee USA Foods Inc
- Jelly- distributed by Sysco Corporation
- Spanish paprika- distributed by US Foodservice, Inc.
- Parsley flakes- distributed by Sysco Corporation
- Canned spaghetti sauce- ConAgra Brands
- Canned garbanzo beans- distributed Sysco
- Juice- Akron, OH

- Mozzarella cheese- distributed by Foremost Farms

In USDA Memo SP 38 -2017, any product that does not identify the country of origin requires certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products.

Achieving Buy American Compliance

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, “We certify that (insert product name) was processed in the U.S. and contains over 51 percent of its agricultural food component, by weight or volume, from the U.S.” This can be accepted in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (https://dpi.wi.gov/school-nutrition/procurement/procurement-manual). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed for Buy American:

❑ **Finding #1:** Cherry tomatoes, yellow bell pepper, and bananas were identified in Northland Pines School District’s storage area as non-domestic from Mexico and Guatemala. Northland Pines School District does not have Buy American – Non-compliant Lists or SFA equivalent form for these product.

Corrective Action Needed: Begin using Non-compliant Product List forms or SFA equivalent for tracking non-domestic products. Provide a copy of the completed forms for the non-compliant products currently in Northland Pines School District’s food storage areas. Provide the completed forms as corrective action. The [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx) is located on the Buy American Provision webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliantlist.docx).

Food Service Management Company

Commendations/Comments/Technical Assistance/Compliance Reminders

Responsibilities which the SFA may “not” delegate to the FSMC.

- Signature authority is the agreement between the SFA and the State agency to participate in the Child Nutrition Programs operated, as attested to in the permanent agreement when submitting the online contract. Thus, signature authority must remain with the authorized representative of the school in the submission of the online contract. This also means that the SFA School Food authority must submit the online contract and not FSMC employed food service director, so they may actual click the attestation button which serves as electronic signature.
- Before the monthly claims are submitted for payment, monthly edit check data must be reviewed by comparing daily meal counts to the number of eligible students to make sure accurate meals are claimed. Monthly edit checks must be reviewed by the authorized representative each month and signature-approved before claim submission, as this is the attestation to the claim’s accuracy.
- Every school year, each SFA with more than one school site must perform no less than one on-site review of the meal counting and claiming system in each school site operating the National School Lunch Program and 50% of schools operating the School Breakfast Program by February 1.

Other SFA responsibilities, which may, in part, be delegated to the FSMC, but still require oversight:

- Maintain responsibility for the implementation of free and reduced-price policy in accordance with 7 CFR 245. SFA responsibilities include conducting hearings and verifications related to applications for free and reduced-price meals.
- An employee of the FSMC may perform for the SFA various aspects of the application and certification process of eligibility for school meals programs, if a provision for this service is included in the scope of the original solicitation.
- Retain title to all USDA Foods and ensure that all USDA Foods received by the SFA, and made available to the FSMC (including processed USDA Foods in processed end products), accrue only to the benefit of the SFA's nonprofit school food service and are fully utilized therein. This provision also applies to any refunds, rebates, discounts, and credits received from processors. The SFA must ensure that the FSMC has credited it for the value of all USDA Foods received for use in the meal service in the school year, in accordance with 7 CFR 250.51(a-d).
- Ensure the FSMC maintains applicable health certification(s) and assures that all State and local regulations are being met by the FSMC in preparing or serving meals at a SFA facility.
- Establish and maintain an advisory board composed of parents, teachers, and students to assist in menu planning.
- Develop the 21-day cycle menu for the FSMC request for proposal, unless the SFA is unable to develop a cycle menu, the FSMC may develop the 21-day cycle menu as long as doing so was a requirement of the original solicitation.
- Retain control of the quality, extent, and general nature of the food service and the prices to be charged to the children for meals. This includes retaining control of the nonprofit school food service account and overall financial responsibility for the programs operated; establishing all prices for all meals served under the nonprofit school food service account (example, pricing for reimbursable meals or non-program foods, such as a la carte foods, and adult meals.)

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. 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](https://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).