

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

School Food Authority: Woodruff Joint #1 School District

Agency Code: 636720

School(s) Reviewed: Woodruff Arbor Vitae Elem.

Review Date(s): April 17-20, 2018

Date of Exit Conference: 4/20/18

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Woodruff Arbor Vitae for the courtesies extended to us during the on-site review. Thank you to the kitchen and office staff 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

38 applications were reviewed, and no errors were found. The school is using Skyward Software, and electronic applications are being utilized. Technical Assistance was given when determining them to use the batch method, and sign and date a note attached to the batch specifying that they were determined and entered into the system.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

Verification was done correctly. The random selection was done by Skyward Software. It was found that one application selected was on the Direct Certification run, and was replaced with another application to be verified. The Verification report was correct.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director and the staff for all they do to feed the children of the Arbor Vitae Woodruff School District, the meals provided are healthy, great tasting, and well designed for health and variety. Your time and effort spent preparing for and participating in the onsite review is much appreciated. All school staff were welcoming and professional. The food service staff had pleasant interactions with students during observed meal services. Kitchens and service areas were very clean as well. The Food Service Director was available to answer questions, nice to work with, and receptive to feedback. The Food Service Director has a clear grasp on all the concepts needed to run a great NSLP and SBP, The FSD is a real asset to your district.

Comments/Technical Assistance/Compliance Reminders

Training

It is recommended that anyone involved with the School Meals Program attend DPI training classes. The classes are offered in the summer and select other times throughout the year. Travel/meal expenses are allowable food service expenses for your program. The classes

provide an overview of all areas of the NSLP and SBP requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics including:

- [USDA food recipes](https://www.youtube.com/watch?v=8tp4WCWcryg&list=UUNnBe12n6q4QT39Fz2y7B Pg) (https://www.youtube.com/watch?v=8tp4WCWcryg&list=UUNnBe12n6q4QT39Fz2y7B Pg)
- [Offer Versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#cyc) (https://dpi.wi.gov/school-nutrition/training/webcasts#cyc)

These can be found on DPI's [Webcast Page](https://dpi.wi.gov/schoolnutrition/training/webcasts) (https://dpi.wi.gov/schoolnutrition/training/webcasts).

The U.S. Department of Agriculture encourages schools to utilize [Smarter Lunchrooms Strategies](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies) to encourage students to make healthy food choices. Smarter Lunchrooms use research-based principles that lead children to make healthy choices but still offer a full spectrum of choice. All Smarter Lunchroom techniques are low- or no-cost, sustainable, and focus on improving the lunchroom environment to promote healthful eating behaviors.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. One of the intents is that someone else (e.g. a substitute food service worker) could produce the planned menu. Be specific on production records about the identity, brand, and description of the items served. Bundled items should be listed by name together including planned amount to be offered. When offering fruit the size should be listed, cups or prepackaged (4.5 oz, or 1.16 oz for example). It is helpful to include not just the portion size, but also crediting on production records. Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Find information on [production records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) “must have/nice to have” here (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).

Grain shortage

During the week of review breakfast production records indicated a weekly grain shortage. The PHN is not convinced there actually was a grain shortage, documentation was provided for cereal bars but none were listed on the production records. Also on-site, during breakfast observation students were offered at least 2 oz eq wg and m/ma. This appears to be a production record issue. Review of weekly production records can help to avoid this issue in the future. **TA was given on site** and finding #2 along with the corrective action needed should help prevent problems in the future.

Standardized Recipes

Recipes should be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in this kitchen. Guidance on what a standardized recipe should include can be found on our [Recipe Resources and Tools](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-

planning/recipes).

Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements. Continue to work towards recipe standardization, and use all resources available to you. Remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. SNT recommends maintaining and organizing this information in a manner that is easy to reference and update, such as a binder or file folders divided into categories. These records should be reviewed and updated as new products are purchased or substituted.

Sliced turkey documentation submitted (Jennie-O 2099) list a serving size as 6 - ½ ounce slice equals 2 oz eq M/MA. The recipe for the turkey sandwich lists three slices of turkey, one slice of cheese, and two slices of bread. The crediting for this sandwich would be 1 oz eq m/ma for the turkey and 0.5 oz eq m/ma for the cheese and 2 oz eq for the bread. If a student chose this option everyday an m/ma shortage would occur.

Grain Based Desserts

No more than 2.0 ounce equivalents (oz. eq.) of grain-based desserts can be offered per week at lunch. Grain-based desserts that are whole grain-rich can count towards the grain component, but grain-based desserts that are not whole grain-rich (made with more than 50 percent enriched grains) cannot count towards the grain component. Grain-based desserts contribute towards the weekly grain-based dessert limit regardless of whether they are whole grain-rich or not (e.g., a slice of cake made with enriched white flour cannot credit towards the grain component, but it counts towards the grain-based dessert limit for the week in which it is served).

During the week of review, a yogurt meal was offered Monday thru Thursday with a Pepperidge Farm Cinnamon Gold Fish Cracker, a 0.9 oz serving which credits as 1.0 oz eq wg over the course of the week a total of 4 oz eq grain based dessert could be chosen by students if they chose the same meal every day. **TA was given on site**, a savory cracker could be offered to students choosing this meal option to meet the daily/weekly grain requirement.

❑ Finding 1: Recipes need to be updated for this kitchen, with the ingredients onsite.

Corrective Action Needed: Please submit the following recipes that have been standardized to your production kitchens.

- Pasta Bake served on Monday 03.05.18
- Separate recipes for the Entrée Salads depending on which ingredients are on hand. Lunch meats, hard boiled eggs, and/or cottage cheese.
- Separate recipes for the turkey sandwich using the USDA sliced turkey and any other slice turkey product used with the correct crediting to avoid weekly shortages.

❑ Finding 2: Production records need to be clear, which items should be offered together, and everything offered to students must be listed.

Corrective Action Needed:

- Submit a statement stating how you plan to organize the production records to be clear.
- Submit a [Breakfast Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-breakfast.doc) and [Lunch Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-8.doc) for one week of your choosing (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-breakfast.doc) and (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-8.doc)

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

- How to locate the agency's Child Nutrition program Report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, was reviewed with the SFA. The Aids Register also shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

Annual Financial Report (AFR):

- 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, and this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 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).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance".
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
 - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".

- Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
- Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
- When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- 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 may be found 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>). 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>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>). The DOR has rules concerning unclaimed property that must be followed
- **Woodruff Arbor Vitae has the required Unpaid Meal Policy on Site.**

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

Commendations:

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Great job running this tool! The current weighted average for 2017-18 SY tool is \$2.86.

Technical Assistance:

- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the PLE 'In a Nutshell' for more information on the PLE tool.
- Refer to the most recent memo from DPI.
- Refer to the most recent guidance memo from USDA.
- Step by step instructions to completing the PLE tool can be found on our financial website under Paid Lunch Equity.

National School Lunch Program Contract

❑ **Finding #1:** The finding is that the Adult Lunch and Breakfast Prices on the contract were not consistent with the price being charged and also listed on the menu. The contract showed \$3.55, and the menu showed \$3.60 for adult lunch. And the adult breakfast price on the contract was \$2.00 and should be \$2.05. With the changes in Food Service from Self-Op to going with a Food Service Management Co., the contract was completed without realizing the increase was not in there. It was found during the Administrative Review that the prices for adult meals for breakfast and lunch were incorrect on the contract, but correct on the menu's.

Corrective Action Needed: The contract was adjusted to reflect the \$3.60 lunch price for adults, and the \$2.05 breakfast price for adults. The contract was re-submitted immediately for approval, and subsequently approved the same day. This was corrected on site, no further action is needed.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All 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.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The DPI Nonprogram Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non->

program-food-price-calculator.xlsx).

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are exempt from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the minimum pricing guidelines in Food Nutrition Services Instruction 782-5.
- A Wisconsin Adult Meal Pricing Worksheet has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.
- Resources
- Nonprogram Foods Revenue Rule SP-20-2016 (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- Nonprogram Foods In a "Nutshell" (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Findings and Corrective Action Needed: Revenue From Nonprogram Foods

❑ **Finding:** The Nonprogram Foods Revenue Tool has not been completed for the current school year.

Corrective Action Needed: The Food Service Director completed the tool on site and provided a copy for DPI. However, I recommend for her to watch the [Nonprogram Foods Revenue Tool webcast](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html), (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html) and provide a copy of the completed quiz questions. This can also be documented and counted as part of Professional Standards Training hours.

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.

- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.

There are no indirect costs charged to Fund 50 – Foodservice.

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 which was updated in October 2015 (<http://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.

And Justice for All Poster

- **“And Justice for All” posters need to be posted in public view where the program is offered. The poster was current and posted in the cafeteria for anyone to view.**

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- **Civil rights training had been attended by all staff in the schools and documentation was available for review.**

Civil Rights Self-Compliance Form

- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the prototype Medical Statement for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner

do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

- 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 have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. For more information on fluid milk substitutes, please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow's milk and pre-approved through DPI. Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program, WSDMP, which allows juice as a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. **At the time of observing the POS (point of service) for both Breakfast and Lunch, no overt identification was seen.**

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complain Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.
- Duties that may not be delegated to the FSMC include:
 - On-site Monitoring
 - Signature Authority
 - Edit Checks – if they are software-generated, the SFA must sign off on them

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

SFA is required to complete an assessment of the Local Wellness Policy (1005)

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your schools report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

Technical Assistance for 1006, if do have a policy: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include a plan to improve upon the results of the assessment.

Technical Assistance was also provided regarding Best Practices to make the Wellness Policy specific to their own school.

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

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 K-8th graders, beverages must meet Smart Snacks standards for the elementary school age/grade group; therefore, items like caffeinated, low-calorie (≤ 5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (< 5 kcal/8 fluid oz; ≤ 10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable. For more information Smart Snacks in a Nutshell is provided to help answer questions. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>)

Findings and Corrective Action Needed: Smart Snacks

❑ **Finding 3:** Two vending machines containing beverages located outside of the main office and in the cafeteria are not Smart Snack compliant.

Corrective Action Needed: Please submit a written statement explaining how the school will ensure the vending machines will be Smart Snack compliant.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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.

Professional Standards: 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 (employment under 20 hours per week): 4 hours

If hired January 1 or later, only half of the training hours are required during the first school year of

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Water fountains are located immediately outside the cafeteria where students have access to anytime.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

A Flash of Food Safety is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofsf/food-safety-flashes). While you're at it, visit the Office of Food Safety website (www.fns.usda.gov/ofsf/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. **Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible. Inspection Reports were current and posted in the cafeteria for anyone to see. The public is able to view from either open hallway adjacent to the cafeteria.**
- **Temperatures**
- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Food Safety Plans

- **The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.**
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the SNT Food Safety webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)

Findings and Corrective Action Needed: Food Safety and Buy American

- All food handlers must have a signed Food Employee Reporting Agreement on file (<https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf>).

- All food handlers must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.
- **All Food Service Employees had a signed agreement on site.**

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

All Food Service documents are kept on site for the required 3 yrs plus the current year at Woodruff Arbor Vitae Elementary School.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Woodruff Elementary USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD
 Summer Food Service Program Coordinator
 Phone: 608.266.7124
 e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action Needed: SFSP and SBP Outreach

❑ **Finding:** The Summer Meals that include Breakfast and Lunch Outreach is not currently being done at Woodruff Arbor Vitae Elementary. It is a requirement of USDA that outreach be done

each school year to inform families and community members where meals are available. Included in this report is information as to how to do the outreach as well as contact information should you have questions or concerns.

Corrective Action Needed: Use the information provided above, and the links shown to include the summer meals outreach in your newsletters, or website, or any information sent to families before the end of the school year to notify them of where summer meals are available. Please send me a statement explaining how you accomplished this task for the end of this school year.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

The Wisconsin School Day Milk Program is being administered in the Kindergarten classes. The Point of Service is correct according to USDA requirements. Great job!

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/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

