

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

School Food Authority: East Troy Community School District

Agency Code: 641540

Review Date(s): 4/9/18–4/11/18

School(s) Reviewed: East Troy Middle School

Date of Exit Conference: 4/11/18

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, meal benefit determination process, 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, or 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 (USDA) 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 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.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at East Troy Community 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.

The food service director and business manager did an excellent job preparing for the review. Documentation was sent prior to the on-site visit well in advance, which allowed for early corrective action to be completed. Additionally, they were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the nutrition programs. The food service staff at the middle school were welcoming, knowledgeable, and clearly dedicated to their work.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Technical Assistance:

Benefit Issuance List

- The benefit issuance list generated from Skyward contained the names of several students that do not attend an East Troy school. These students do need to be entered into Skyward for various reasons (listed as household member on application for East Troy student, special education service, etc.). However, these students should not appear on the benefit issuance list since they are not receiving meal benefits in the SFA. Please work with Skyward as needed to manage these non-enrolled students in the student information system.

Direct Certification Approval Letter

- The letter used to notify households of their approval for meal benefits based on direct certification must contain an explanation that the child is eligible for free/reduced meals without further application, clarify that eligibility extends to all school aged children in the household, inform households how to notify the SFA of any additional school aged children in the household not listed on the notification, explain how households can decline benefits, and include the full non-discrimination statement. See corrective action below.
- The letter does contain minimal information about benefit extension for other children in the household, however more detail is desirable. Please reference [the DPI Direct Certification Approval Letter](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter-1718.doc) for suggested language (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter-1718.doc).

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc).

- There are some limited instances when parental consent is not required for sharing of information. Please reference the [Disclosure Section of the Eligibility Manual](#) for a detailed chart of under what circumstances free/reduced information may be shared (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).
- For anyone receiving eligibility information for non-food service program purposes, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Refusal of Benefits

- While the SFA did not have any households decline/refuse awarded meal benefits this school year, it is recommended to have procedures in place should this occur in the future. The SFA should obtain a written request from the household for refusal of benefits. The SFA should then update the students' benefit status as requested by the household on the day the request was received. The household may request that the benefit be reinstated any time during the school year.
- Please reference [Delivery of Benefits in the Eligibility Manual](#) on page 53 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Electronic Determination of Applications

- The determining official is responsible for assessing completeness of submitted applications and adding application information into Skyward. Skyward then automatically determines student eligibility based on the application information entered. The determining official does not calculate household incomes or make a determination manually based on the income eligibility guidelines.
- It is strongly recommended that a some type of “double check” system be used for application determination and Skyward entry. One option for a double check would be to have a person other than the determining official check that all application information was correctly entered into Skyward to ensure incomes are not missed or income frequencies are not misreported. Another option for a double check would be for the determining official to manually determine applications and compare to the determination in Skyward. Please reference [Establishing Eligibility Q & A in the Eligibility Manual](#) on page 72 for more information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Income Frequency

- When an application has multiple income frequencies listed, the income should be annualized before a determination is made. On the other hand, when an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual or monthly, but instead use the [Income Eligibility Guidelines](#) to look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

SNACS

- School Nutrition Accountability Software (SNACS) is a software program developed and administered by DPI through grants from USDA. SNACS is a free software program with functions including online free/reduced price meal applications, direct certification assistance, meal counting system, step-by-step verification guidance, automated letter generation capabilities, and simplified reporting. A few benefits of SNACS include verification completion assistance, automated notification letters updated annually by DPI, and support provided by the DPI School Nutrition Team.
- SNACS does not contain a point of sale module, so it cannot be used to track meals purchased or to track account balances. For this reason, a district the size of East Troy Community School District that is considering using SNACS would likely want to use it alongside their current software program which includes POS services. SFAs that use SNACS in combination with their current POS

software can export their student eligibility information from SNACS and add it to their POS software to track meals and eligibility.

- For more information about a software demo, the upcoming SNACS webinar, or other questions about utilizing SNACS please contact Tanya Kirtz (Tanya.Kirtz@dpi.wi.gov; 608-266-2410). [SNACS information](#) can also be found on the School Nutrition website (<https://dpi.wi.gov/school-nutrition/snacs>).

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](#) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. Source documentation means that the information originally used to determine the student's meal eligibility is shared with the school requesting the information for the new or transfer student. Source documentation may include a copy of the original application or a copy of a DC run with the student's name listed. A phone call or copy of a benefit approval letter are examples of documentation that would not be sufficient to establish the new or transfer student's eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Backdating Foster Child Status

- During the on-site review, the determining official requested assistance with a unique situation involving a foster child. The student began receiving free meal benefits in January when first matched on a direct certification run. During the week of on-site review, the determining official was contacted by a social worker that stated the student was a foster child and requested the free benefit be backdated several months to eliminate a negative account balance.
- It is particularly important that new Other Source Categorical Eligible children, such as foster children, be documented and certified for free meals as promptly as possible. Clear procedures should be established between the liaison(s) and foodservice to minimize delays. If these

communications are delayed, it may lead to unpaid meal charges. The effective date of eligibility is the date in which food service was first notified of the status and cannot be made retroactive. Proper documentation to substantiate free meal eligibility consists of the child's name or a list of names, effective date(s), and the signature of the appropriate liaison. This documentation is acceptable in lieu of a free and reduced price meal application.

- Meal eligibilities cannot be made retroactive unless the SFA is approved to use the submission date as the effective date. This flexibility applies only to complete applications containing all required information. In this case, the determining official had not received the appropriate documentation from the social worker and was not otherwise notified of the foster child status until April. For this reason, the flexibility described would not apply to this situation. See SP 11-2014 for more information.
- If the SFA wishes to use this flexibility in the future, the SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding A:** Of the 241 eligibility determinations reviewed, 11 errors were identified. One application affecting two students was improperly categorized as free, when it should have been reduced due to a reported income that was not included in the determination calculation. The remaining nine errors were due to software issues that resulted in improper benefit issuance, when in fact the students did not have applications or direct certification information to support a benefit.

Corrective Action Needed for Finding A: Send customized adverse action letters to the five households affected by these errors to notify families of their decrease in benefit status that will occur 10 calendar days from the date the letter is sent. Update the benefit issuance system on the 10th calendar day to reflect each students' new meal benefit status. Submit copies of the adverse action letters to the consultant. Continue working closely with Skyward to ensure the errors caused by software issues do not occur in the future. Corrected on-site; no further action required.

- ✓ **Finding B:** The names of the Hearing Official and Confirming Official listed on the online contract do not accurately reflect the staff members that currently hold the associated responsibilities.

Corrective Action Needed for Finding B: Please update the online contract with the names of the current Hearing Official and Confirming Official. Corrected prior to on-site review; no further action required.

- ❑ **Finding C:** The direct certification approval letter does not contain instructions on how a family could decline benefits for which they are eligible. Please reference [the DPI Direct Certification Approval Letter](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter-1718.doc) for suggested language (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter-1718.doc>).

Corrective Action Needed for Finding C: Update the direct certification approval letter so that it contains all required information. Submit a copy of the updated letter to the consultant.

- ❑ **Finding D:** The fee waiver form used to provide registration fee and AP exam fee reduction requires updating. On the form, both fee waivers are listed together under the same checkbox, which does not allow families to consent to information being shared for individual fees.

Discussions with the determining official and business manager indicate that the AP fee waiver is no longer offered.

Corrective Action Needed for Finding D: Update the fee waiver form so that each individual fee waiver is broken out on a separate line so that households can consent to information being shared for each waiver. Alternatively, if only the registration fee reduction will be offered, please update the form to reflect this. Submit updated fee waiver form to the consultant.

Verification

Commendations:

- The verifying official did an excellent job following up with families selected for verification. Pay stub information submitted contained overtime pay and the verifying official appropriately contacted the household to clarify if overtime pay is regular.

Technical Assistance:

- The confirming official views application information in Skyward and signs off on the verification tracking tool when the determination is confirmed. While this does indicate that a confirmation review occurred, it is strongly recommended that the confirming official view the original hard copy of the application and sign off on it.
- 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. See corrective action below.

Findings and Corrective Action Needed: Verification

- ✓ **Finding E:** The adverse action letters sent to households receiving a decline in benefits after verification did not give the families the required 10 calendar days before benefit reduction.

Corrective Action Needed for Finding E: The 10 calendar day requirement for adverse action was discussed with the verifying official. The verifying official updated the verification instruction manual used annually for verification processes to reflect this requirement. Adequate understanding of this requirement was demonstrated by the verifying official on-site. Corrected on-site; no further action required.

Meal Counting and Claiming

Technical Assistance:

Field Trip Meals

- It is great that field trip meals are offered to students so that they have access to an affordable, nutritious meal while on a trip. However, the current point of sale procedures are not currently being met. See corrective action below.

Visiting Students

- Please note that SFAs may claim visiting students in the paid category or the individual's benefit category with documentation, unless they are from a CEP school.

Enrollment on Claims

- Different reports generated by Skyward provide different enrollment data based on the parameters set. When completing monthly claims, please be sure to use the enrollment numbers that indicate the highest number of students enrolled at each school with access to the meal program being claimed for. Students that do not attend the school the claim is for or who do not have access to the meal program being claimed for should not be included in the enrollment number on the claim. Please work with Skyward as needed to determine how to run reports that generate this data.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding F:** The current POS system for field trip meals does not meet POS requirements. Currently, student accounts are charged for field trip meals when the meals leave the kitchen for the field trip. Any students that get sick or do not eat their meal are then refunded later. This constitutes a “back out” system of counting and claiming since meals are charged to student accounts before the student takes and eats the meal.

Corrective Action Needed for Finding F: Please modify the field trip POS system so that students are checked off by the accompanying teacher as they take their meal. Completed check off sheets should be returned to food service and used for charging student accounts and claim submission. The [Field Trip meal resources](#) can be of assistance in the modification of field trip POS (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). Please submit a written plan to the consultant detailing how field trip meals will be counted and claimed going forward, including a copy of the check off sheet that will be used at the POS.

- ❑ **Finding G:** The online contract indicates that the Wisconsin School Day Milk Program (WSDMP) is offered at Prairie View Elementary School. However, this program is not being offered in the SFA this school year.

Corrective Action Needed for Finding G: Update the online contract so that it accurately indicates that the SFA is not in the WSDMP. Notify the consultant when the contract has been updated.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Thank you to the food service director at East Troy Community School District for sending all documentation prior to the Administrative Review (AR) in an organized manner as this greatly expedited the AR.
- Thank you to the food service staff at East Troy Middle School for the friendliness and cooperation during the onsite visit. There were no issues with Offer versus Serve (OVS) and all meals were reimbursable.
- New to the position, the food service director is doing a great job meeting meal pattern requirements, as well as offering staff training at the beginning of each school year on OVS and food safety. The food service director has tried different breakfast models, even creating a

breakfast survey for students in an attempt to increase participation. Thank you for serving healthy, nutritious meals to the students of East Troy Community School District!

Technical Assistance:

Training

- Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check the [training webpage](https://dpi.wi.gov/school-nutrition/training) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). All members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (dpi.wi.gov/school-nutrition/directory).

Breakfast Participation

- Breakfast participation at East Troy Middle School is low compared to the number of students attending. Increased participation in the School Breakfast Program (SBP) will enable the School Food Authority (SFA) to help students start their school day with good nutrition and for the school to earn reimbursement for breakfasts served.
- Currently, the breakfast is being offered before school on a cart in a general meeting area with one table set up on a stage designated for students eating breakfast. A breakfast survey was sent out to students at the beginning of the school year. Some responses on the survey regarding barriers to breakfast participation included not wanting to sit up on the stage to eat breakfast due to feeling stared at by other students in the meeting area while eating. For a more enjoyable experience and to help increase participation, consider offering school breakfast traditionally in the cafeteria where students can select more options, sit down at a table, and enjoy a nutritious, well-balanced meal. Get teachers involved with school breakfast by encouraging them to select a reimbursable breakfast as well, or sit and talk with students while they eat. Switching to a cafeteria-based breakfast can also allow students to sit with their friends while they enjoy breakfast, remove the stigma of sitting on the stage for breakfast, and allow the food service staff to stay close to their work area and manage deliveries that arrive during service times.
- In addition to the traditional, cafeteria-based breakfast model, schools may also consider an alternative breakfast model. For example, "Breakfast in the Classroom" involves serving the breakfast meal to children during a morning class, often while the teacher is taking attendance or giving classroom announcements. Schools operating "Grab & Go Breakfast" serve children a breakfast "to go," often in a paper or plastic bag, before school or during a morning break. Consider offering a second breakfast during late morning for students who are not hungry first thing in the morning. To learn more about these and [other breakfast service options](#), please see the School Breakfast Program webpage (<https://www.fns.usda.gov/sbp/school-breakfast-program-sbp>).
- [Additional breakfast resources and contact information](#) for School Breakfast Program specialists is available on the DPI School Breakfast webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>).

Standardized Recipes

- Any menu item that is made in-house with more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used.
- A few recipes used during the review week were not properly standardized and the amounts differed from what was actually being made. Technical assistance was given on-site to analyze servings and the recipes were updated right away. Visit the [recipe tools and resources](#) webpage to aid in the standardization process (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). There is also a checklist of information necessary to standardize

a recipe, calculators to assist with nutrient analysis, and a template to help organize the information.

Crediting Documentation

- Any processed product that is not listed in the FBG requires a current CN label or a detailed PFS to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct.
- If a processed item does not have a valid CN label or PFS and cannot be found in the FBG, it may not be credited when served as part of the USDA School Meal Programs. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- Product formulations change frequently, so it is important that nutrition facts labels, CN labels, USDA Foods Product Information Sheets, and PFS's on file are kept up-to-date. State-Processed and USDA Product Information are updated annually and can be found:
 - [SY 2017-2018 State-Processed Product Nutrition Information](https://dpi.wi.gov/school-nutrition/usda/product-information) - WI-processed (<https://dpi.wi.gov/school-nutrition/usda/product-information>)
 - [USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) - Commodities (<https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets>) are organized by component and updated annually. CN labels can be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed.

Food Buying Guide

- The [USDA Food Buying Guide for School Meal Programs](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods), including whole fruits like oranges, apples, bananas, and kiwis (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>). Foods that do not have standards of identity are not listed in the Food Buying Guide and require further documentation (a CN label or a PFS) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs.
- [The Food Buying Guide Mobile App](https://www.fns.usda.gov/tn/food-buying-guide-mobile-app) provides quick access to food yield information to help you make quick purchasing decisions from your mobile device (<https://www.fns.usda.gov/tn/food-buying-guide-mobile-app>).

Whole Grain-Rich Requirement

- Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component.
- The following grain products are not WGR: Keebler Honey Grahams (14g) and Barrel O' Fun Corn Chips (1.125oz). USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).
- The term "corn" on a product label does not necessarily mean that a product is WGR. Always check the ingredient list to confirm the first ingredient is a whole grain and any other grain ingredients in the list are enriched, if not whole. Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients.

Crediting Grains

- Grains can be credited based on weight using Exhibit A of the FBG. If a product is not on Exhibit A, you must obtain a PFS from the manufacturer that lists the *grams of creditable grain* in the product.

- [Exhibit A](#) is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1 oz. eq. for each specific group (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf). Exhibit A groups all grains products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:
 - Group A: these products are hard and crunchy and dry and lightweight. Per ounce, they contain a good deal of grain.
 - Group B: whether serving bagels, pizza crusts or tortillas, 1 ounce of these products all credit the same towards the meal pattern (1 ounce = 1 oz. eq. grain).
 - Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1 ounce of pancake does not credit as 1 oz. eq. like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz. eq. grain.
- Exhibit A can be used to credit any of the products that appear in this table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding H:** The following non-whole grain-rich products were offered during the week of review and day of onsite: Keebler Honey Grahams (14g) and Barrel O’ Fun Corn Chips (1.125 oz.).

Corrective Action Needed for Finding H: Find whole grain-rich versions of the products listed above. Submit any applicable documentation (i.e. nutrition facts label, ingredient list, product formulation statement).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance:

Annual Financial Report

- The SFA did not include the value of USDA foods in the appropriate sections of the Annual Financial Report. Beginning in the School Year 2017-18, the cash/entitlement value of USDA foods should be listed as both a revenue and an expenditure on the Annual Financial Report.
 - For revenues, the value of USDA foods should be reported under the “School Food Revenue (Excluding Transfers)” section of NSLP. This values is found on the Commodity Allocation and Receipt Report or CARS Report in the USDA Foods tab of online services.
 - For expenditures, the value of USDA foods should be reported under the “Food” section of NSLP.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot 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>

- 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. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).
 - The SFA has allowed families to use remaining food service balances to pay for other school fees due when the student is preparing to leave the district, and refunds the remaining balance upon request. It is acceptable for individual households to elect to use their student meal account balances to reduce other fees due to the school if consent is obtained in writing. The SFA must obtain written consent to use meal account balances in this way.
 - 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>).
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Paid Lunch Equity (PLE)

Technical Assistance:

- The SFA expressed interest in subsidizing paid lunch prices with non-federal funds in the upcoming school year in lieu of raising prices. If the SFA is required to increase paid student lunch prices by the PLE regulations soon to be released by USDA, the SFA may complete the non-federal calculator or split calculator to determine the amount of the required transfer from non-federal funds. If the SFA decides to make a transfer in lieu of raising paid student lunch prices, this transfer must be made at the beginning of the 2018-19 school year. Transferring the funds at the start of the school year ensures that funds are readily available to operate the program throughout the school year.
 - Please continue to watch for PLE notifications and resources to be released for the 2018-19 school year.
-

Revenue from Non-Program Foods

Commendations:

- The food service director did an excellent job completing the non-program foods revenue tool. The tool was completed prior to the review, was thorough, and appeared accurate. The outcome of the tool indicated that the SFA is in compliance with the non-program foods revenue requirements.
- The system in place for resource management of catering events is great. The accountability system appears accurate. All requested information regarding catering was easily provided and was well organized.

Technical Assistance:

- Non-program food revenue should be assessed annually to ensure compliance and determine if prices need to be increased. Please be sure to complete the non-program foods revenue tool each year.
 - Labor fees are currently being added to catering events that occur within the district using mark-ups negotiated by the business manager and food service director. Currently, no labor fees are added for external catering events because the external customers typically directly pay any food service staff that assist with set up or service. It is strongly recommended to charge external catering customers some labor fees that are associated with the ordering and preparation of food items sold. The food service director and business manager should work together to determine how to appropriately charge labor fees associated with external catering.
-

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

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. See corrective action below.

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. Be 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 Complaint 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).
 - Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](https://fns-prod.azureedge.net/sites/default/files/113-1.pdf) resource (<https://fns-prod.azureedge.net/sites/default/files/113-1.pdf>).

Special Dietary Needs

- Currently, the food service director receives notification from the school nurse of any children with special dietary needs requested on their submitted health forms. The food service director does not receive copies of these forms from the school nurse. It is strongly recommended that the [prototype Medical Statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) for Special Dietary Needs be used in the SFA (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). The form could be included as part of registration materials, in addition to the current health form used. The school nurse and food service director should both retain copies of the signed medical statements submitted by households to support the dietary accommodations offered by the food service department. See corrective action below.

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement 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>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- 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, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. 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>).
- 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 allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Findings and Corrective Action Needed: Civil Rights

- ✓ **Finding I:** Civil rights training had not been completed by the business manager or database manager—both of which have access to students’ free/reduced information.

Corrective Action Needed for Finding I: Both staff members completed the civil rights training and logged the training appropriately prior to the on-site review. Corrected prior to on-site review; no further action required.

- ❑ **Finding J:** The food service director currently does not maintain the signed documentation from a medical practitioner describing children’s special dietary needs accommodations. Because the food service director is responsible for overseeing any dietary accommodations within food service, the food service director should be provided copies of the signed medical statements submitted by households that support the accommodation.

Corrective Action Needed for Finding J: Please provide a statement to the consultant how special dietary needs requests will be documented/verified by the food service director before accommodating special dietary needs requests going forward.

Local Wellness Policy (LWP)

Commendations:

- The SFA has shown dedication and great effort in establishing a wellness policy. It is clear that the SFA is committed to creating measurable goals for district wide wellness.

Technical Assistance:

Wellness Policy Final Rule

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.
- At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Public Involvement

- Adding information about the wellness committee to the annual newsletter may be an effective way to recruit parents for involvement.
- Posting information on the food service webpage about who to contact to get involved with the wellness committee may be an effective way to recruit community members or other members of the general public for involvement.

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](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<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).

Triennial Assessment

- 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 the 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 school's 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.
- Additionally, the SFA is required 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 an improvement plan upon the results of the assessment.

Resources:

- 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).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding K:** The LWP meets some, but not all, requirements as stipulated above. The current policy lacks required language pertaining to policy leadership, public involvement, food and beverage marketing and the triennial assessment. Additionally, it is recommended to add some language to the wellness policy pertaining to Smarter Lunchroom techniques.

Corrective Action Required for Finding K: Please provide a timeline for updating the policy to become compliant with the final rule by adding language regarding the topics listed.

Smart Snacks in Schools

Commendations:

- Great job to East Troy Community School District for tracking fundraisers—both compliant and non-compliant. Although the tracking tool lacked information to determine compliance and contained information that indicated non-compliance, having a district-wide system of tracking fundraisers shows a desire to comply with Smart Snacks regulations, which ultimately benefits students.

Technical Assistance:

Overview

- All foods and beverages sold to students on the school campus during the school day (outside of a reimbursable meal) must meet both the general and nutrient standards, unless the sales qualify for an exemption (i.e. fundraiser selling non-compliant products, but abiding by the fundraiser limits, outlined below).
- More information can be found on the [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>) or in the [Smart Snacks “In a Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).
- To determine if a product meets the general and nutrient standards, use the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) to assess compliance (<https://foodplanner.healthiergeneration.org/calculator/>). Simply answer a series of questions, then save and print the results for your records.

Fundraisers

- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization, per school, per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but this may not occur in the meal service area during meal service times. There are no selling restrictions with compliant fundraisers.
- 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.

Fundraiser Tracking Tool

- Although great information is included on the district tracking tool such as dates, student organizations, and if the fundraiser is compliant or not, there is additional information required.
 - The Fall Athletics (girls and boys basketball) does not list the exact dates the fundraisers were held nor products sold. Because this is listed as a non-compliant fundraiser, dates must show that they do not exceed two consecutive weeks in length each.
 - Dates of “2017-18” and “2016-2017” are not specific enough and exceed the two-week, non-compliant fundraiser limit.
 - There is a list of items sold with an ‘N’ for not meeting Smart Snacks standards and a ‘Y’ for meeting Smart Snack standards. However, many of the items with a ‘Y’ are not in fact compliant as they do not meet the general and/or nutrient standards as determined by the Smart Snacks calculator.
 - East Troy Middle School Student Council holds four school dances per year that take place during school hours. Because these are held by the same student organization, this does not meet the two fundraiser per student organization, per school year, per school year rule.

Consider selling all compliant products with no selling restrictions, or develop a plan for how the two fundraiser limit is not exceeded.

- These types of ongoing, unhealthy food fundraisers do not align with the intentions of Smart Snacks, The Healthy Hunger Free Kids Act, or the regulations outlined in the [Permanent Agreement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-permanentagreement.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-permanentagreement.doc). Because schools agree to comply with the regulations set forth by USDA when they choose to participate in the child nutrition programs, willful noncompliance of regulations can result in the loss of federal funding.
- In addition, these fundraisers do not align with [East Troy School District's Local Wellness Policy](https://easttroy-my.sharepoint.com/:w:/r/personal/dralis_easttroy_k12_wi_us1/_layouts/15/Doc.aspx?sourcedoc=%7B82f54a9a-a535-4e5c-8a7c-89eac6b073bd%7D&action=edit) (https://easttroy-my.sharepoint.com/:w:/r/personal/dralis_easttroy_k12_wi_us1/_layouts/15/Doc.aspx?sourcedoc=%7B82f54a9a-a535-4e5c-8a7c-89eac6b073bd%7D&action=edit) (pg. 247):
 - “B. Food and Beverages Sold Outside of the School Meals Program
 - 1. All food and beverages sold and served outside of the school meal programs (“competitive” foods and beverages) shall, at a minimum, meet the standards established in USDA’s Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule. The standards are available at <http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks>.
 - 2. The District adheres to the Wisconsin Department of Public Instruction fundraiser exemption policy and allows two exempt fundraisers per student organization per school per year. All other fundraisers sold during the school day will meet the Smart Snacks nutrition standards. No restrictions are placed on the sale of food/beverage items sold outside of the school day.”
- The East Brew Cafe is doing a great job documenting the student organization holding the fundraiser, abiding by the two fundraiser limit per student organization, as well as the two-week limit per non-compliant fundraiser.
- More information on healthy fundraiser options can be found on our [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks). The [Center for Science in the Public Interest's School Fundraiser Fact Sheet](https://cspinet.org/sites/default/files/attachment/Fundraising_Ideas_Fact_Sheet.pdf) shows the benefits of non-food fundraisers (https://cspinet.org/sites/default/files/attachment/Fundraising_Ideas_Fact_Sheet.pdf). Many schools around the country have found that they can still bring in as much, if not more, money using non-food or healthy food fundraisers. Perhaps this is something for the district to gradually work towards.

Findings and Corrective Action Needed: Smart Snacks

- ❑ **Finding L:** East Troy Middle School Student Council holds fundraisers during a school dance four times per year, which sells non-compliant products (minus the cheese stick and water, which are compliant without selling restrictions). This does not meet the two fundraisers per student organization, per school, per school year rule. Keep in mind that an exempt fundraiser can be two consecutive weeks in length, but cannot be broken up into two, one-week fundraisers offered at different times.

Corrective Action Needed for Finding L: Submit a statement explaining how East Troy Middle School will bring all food and beverage fundraisers into compliance. Include specifics on who at the school will be responsible for tracking exempt fundraisers and how documentation will be kept.

- ❑ **Finding M:** The school store at East Troy Middle School sells non-compliant products. The Lay's Potato Chips have calories from fat that exceed 35% and the goldfish exceeds the sodium limit of 200mg and are not whole-grain rich.

Corrective Action Needed for Finding M: Submit a statement explaining how these non-compliant products will be discontinued, as well as a timeframe for when this will go into effect.

Professional Standards

Commendations:

- The food service director does a great job providing training opportunities for food service staff members. The professional standards tracking tool is kept up to date and is well organized. It is clear that the food service director greatly values staff training and consistently encourages attendance at the DPI SNSDC classes.
- All staff members have completed, and in most cases exceeded, the annual training hours required for the current school year. Keep up the good work fitting training hours into the work schedule!

Technical Assistance:

Training Tracking Tool

- The professional standards training tracking tool utilized in the SFA is acceptable, but could be improved upon. Suggestions for tool improvement were provided by the consultant prior to the on-site review. The food service director updated the tracking tool based on suggestions provided. The tool now contains more detailed information about each employee's position, hours worked, and USDA professional standards learning codes. Great job accepting suggestions and making improvements accordingly!

Annual Training Requirements for All Staff by Position

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

Findings and Corrective Action Needed: Professional Standards

- ✓ **Finding N:** The business manager is subject to four hours of professional standards training annually based on regular job duties for the nutrition programs. The business manager has met the training requirements for the school year, but had not been tracking training hours completed,

Corrective Action Required for Finding N: Prior to the on-site review, the business manager created a personal tracking tool for logging professional standards training hours. This tracker was submitted to the consultant. Corrected prior to on-site review; no further action required.

Food Safety

Commendations:

- The food service staff at East Troy Middle School appear very knowledgeable about food safety. The kitchen and serving lines were very clean. Employees were observed practicing safe handling consistently throughout meal service.

Findings and Corrective Action Needed: Food Safety

- ✓ **Finding O:** The food safety inspection report posted in the cafeteria was not the most recent report.

Corrective Action Needed for Finding O: The kitchen manager/cook promptly posted the most recent report on the cafeteria bulletin board upon request by the consultant. Corrected on-site; no further action required.

Buy American

Commendations:

- Great job to the food service director for having complete forms for all non-domestic products in storage prior to the AR. Documentation was thorough and demonstrated compliance with the Buy American Provision.

Technical Assistance:

- The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, farmers, and provides healthy choices for children in the USDA School Meal Programs. 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. More information on this new requirement, including a tool to assist with tracking non-compliant products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).
 - 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. Please reference the [Solicitation and Contract Language](https://dpi.wi.gov/school-nutrition/procurement/buy-american/solicitation-and-contract-language) section of the Buy American webpage for more information (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/solicitation-and-contract-language>).
-

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

Technical Assistance:

School Breakfast Program

- The SFA meets the promotion requirements for the School Breakfast Program. However, it was noted that breakfast participation at East Troy Middle School is very low. Suggestions for improving breakfast participation are provided in the Meal Pattern and Nutritional Quality section of this report.

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 East Troy Community School District, USDA requires 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](#) 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](#) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in the area, see the [interactive map](#) 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 P: The SFA did not notify families of the availability of summer feeding programs in the surrounding area.

Corrective Action Needed for Finding P: Please provide a statement describing how the SFA will notify district families of summer feeding program availability for the upcoming summer.

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 student success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](#) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!