

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

School Food Authority: Lake Geneva-Genoa School District

Agency Code: 64-2884

School(s) Reviewed: Brookwood Elementary School

Review Date(s): 1/22-24/18

Date of Exit Conference: 1/24/18

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Lake Geneva-Genoa for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- Of the 602 students eligible for free or reduced price meals in December, a sample of 301 was reviewed and 3 were determined incorrectly.

Applications

- Applications must be signed and dated by the determining official at the time of approval.
- The application determination and income amount should be recorded on the back of the application with the determining official signature.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.
- Badger Care is not a qualifying program for a cases number application.

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for the application to be considered complete.

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](#) 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>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, 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>).

Public Release

- SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** From the student sample reviewed for benefit's issuance, 1 student is receiving free benefits via case number but should be reduced via income application, because the application was approved free with an invalid case number due to Badger Care being selected.

Corrective Action Needed: Please notify this households of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be figured for these errors for the review period (December) and month of on-site review (January). Completed on-site no further action required.

- ❑ **Finding #2:** From the student sample reviewed for benefit's issuance, 2 students are receiving reduced benefits which should be full pay.

Corrective Action Needed: Please notify these households of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be figured for these errors for the review period (December) and month of on-site review (January). Completed on-site no further action required.

- ❑ **Finding #3:** One application was incorrectly denied and should have been approved as reduced.

Corrective Action Needed: Please notify the household of the increase in benefits to take place within 3 calendar days, and record the date of correction on SFA-2 form and send completed copy as corrective action. Completed on-site no further action required.

- ❑ **Finding #4:** Since Genoa Joint #2 is in an Alternate Agreement with Lake Geneva, the free and reduced eligibility information should not be accessible to Genoa staff because they do not administer child nutrition programs. Only Genoa administration may have access for reporting WISE data.

Corrective Action Needed: Please submit a statement of understanding that only those in administration will have access to the free and reduced information. Please submit a signed [disclosure agreement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) for all persons who will be receiving this information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx).

- ❑ **Finding #5:** The Public Release is submitted to a local newspaper for both the Lake Geneva-Genoa and the Lake Geneva Joint #1 SFAs, but it is not distributed to local grassroots organizations (public libraries, food pantry, churches, etc.) and unemployment offices. Please share with major employers contemplating layoffs, as applicable.

Corrective Action Needed: Please submit a statement of the process to use for school year 2018-19 to include the appropriate places/agencies when distributing the Public Release.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable, but these verifications are not considered part of the Verification sample. For more information, refer to the current [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- DPI has created [Field Trip meal resources](#) to help schools offer student meals every school day.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #1:** Students are charged for their field trip meals via a checklist that is obtained from the teachers, and if the student does not take the meal, the charge is removed. This is an unacceptable point of service as meals may only be charge to a student at the time the student receives the meal. Milk choice must also be offered to all students with their field trip meals.

Corrective Action Needed: Please train all teachers and staff on the correct point of service for [field trip meals](#) and submit the sign-in roster as corrective action (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations/Comments/Technical Assistance/Compliance Reminders

- Sincere thanks to the Food Service Director at Lake Geneva-Genoa School District. We appreciate your time and efforts spent preparing for and participating in the off-site and on-site review. All kitchens and service areas were clean, and well-organized. You and your staff were all a pleasure to work with!

Crediting

- Acceptable crediting documentation was not available for the products listed below. Product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting must accompany processed foods that are not listed in the USDA Food Buying Guide for School Meal Programs. Please provide crediting information for these products by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the product(s). If proper documentation cannot be obtained, you should discontinue using these products for school meals. More information about crediting documentation can be found on the [Meal Pattern Components](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>).
 - BeneFIT Banana Chocolate Chunk Breakfast Bars. Documentation provided did not provide an ingredient list, which is needed to verify that the product is whole grain-rich.
 - Crunchmania. Documentation provided did not show the gram weight of product, which is needed to verify crediting.
 - Grecian Delight Roasted Red Pepper Hummus. This product is not on their K12 approved list and therefore a PFS was not available. PFS provided by FSD did not match with the product they are offering. It is important that the product offered to students matches the product label on file at the school.
 - Coleslaw. No PFS is available from the manufacturer. Therefore reviewer unable to determine crediting for the meal pattern. Discontinue use or offer as an extra. Note: if offered as an extra, the product still needs to be considered in the meal pattern dietary specifications.

Standardized Recipes

- A few recipes used during the review week were lacking pieces of information necessary for standardized recipes. Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly meal pattern requirements. Technical assistance was given to include age/grade groups, recipe instructions, pans used, weight and/or volume measurements, equipment used, and serving utensils for proper portioning of the menu item. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen.
- In addition, the Tomato Soup and Mashed Potatoes did not have standardized recipes. Kitchen staff use the instructions on the product label. This is unacceptable as the standardized recipe has to be tailored to the food service operation.

- Guidance on what a standardized recipe should include can be found on our [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>) or [contact a Public Health Nutritionist](https://dpi.wi.gov/school-nutrition/directory) for assistance (<https://dpi.wi.gov/school-nutrition/directory>).
- Update the following standardized recipes:
 - Turkey & Gravy (12/13) - cooked chicken is added, but not listed in the ingredients. Additionally, there are no instructions for how to prepare the dish. Update the standardized recipe with this information.
 - Ham and Cheese (12/14) - bun gram amount and crediting are incorrect
 - Toasted Cheese (12/15) - two different recipes were sent prior to the on-site review. However, upon discussion with the Food Service Director, they are preparing the Toasted Cheese sandwiches the same way at each site. Update the standardized recipe.
- Create standardized recipe for:
 - Mashed Potatoes (12/13)
 - Tomato Soup (12/15)

Transport Sheets/Production Records

- Production records and transport sheets are intended to be useful tools to record required information to document that food meeting the meal pattern was served appropriately. There was some missing information on the production and transport sheets provided prior to the on-site review. For lunch, transport sheets need the following information:
 - Meals ordered and served to students and adults - it was unclear if the numbers listed on the documents were the number ordered or actually served.
 - Temps when carts are loaded at production kitchen, when good arrives at the satellite kitchen and right before meal service.
 - Description of menu items should be specific
 - Fruit count size (apples) - in order to correctly determine the crediting, the count size (example, 125 count apples) if needed.
 - For Breakfast, the production records need to include the following information:
 - Meals planned, meals served, age/grade groups, planned number of portions/servings, purchase units.
- While there is no required production record or transport sheet templates, there are some examples that may be used on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage. A copy of the production record requirements (“Must Haves and Nice to Haves” list) can also be found at that link (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Meal Pattern

- Transport sheets list meal pattern requirements for grades K-8. Since Brookwood Elementary is only serving students in grades K-3, it is more appropriate to follow meal pattern requirements for grades K-5. It is recommended to update the transport sheet to reflect meal pattern requirements for grades K-5.

CACFP

- It was noted that 4k students do not eat lunch at Brookwood Elementary but they are co-mingled at breakfast. Because students are co-mingled at breakfast, the school has the flexibility to continue to serve the k-5 meal pattern.
- If this changes in the future and the 4k students do start to eat lunch and/or get breakfast in a non co-mingled manor, then the updated Child and Adult Care Food Program (CACFP) meal pattern will need to be followed. This new meal pattern, which was implemented on October 1, 2017, replaces the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary

Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

❑ **Finding #1:** Thursday 12/14 of the week of review, the coleslaw was unable to be credited. No PFS was available. This is considered a daily vegetable shortage because the only other vegetable offered were the sweet potato fries (only offered 1/2 cup to students). 3/4 cup is the daily minimum. This is not a repeat finding for this administrative review, however, repeat violations during subsequent Administrative Reviews will result in fiscal action.

Corrective Action Needed: You may choose a different coleslaw product with a valid PFS to determine crediting, discontinue the use of the product or you may count as an extra and not count the product towards the meal pattern. Submit a statement that details your plan and submit a valid PFS if you choose to continue to offer coleslaw. Indicate how you will ensure that students are offered 3/4 cup vegetable daily.

❑ **Finding #2:** Inadequate crediting documentation for the Hummus resulted in insufficient weekly subgroup quantity offered. Considered insufficient quantity and not missing vegetable subgroup because Hummus was offered to students, but unable to credit to do inadequate crediting documentation.

Corrective Action Needed: You may choose a different hummus product with a valid PFS to determine crediting, discontinue the use of the product or you may count as an extra and not count the product towards the meal pattern. Submit a statement that details your plan and submit a valid PFS if you choose to continue to offer hummus. In addition, complete and submit a menu planning worksheet for the week of review.

❑ **Finding #3:** Unacceptable crediting documentation was provided for the products listed below.

- Crunchmania
- Breakfast bar

Corrective Action Needed: Obtain and submit copies of proper crediting documentation from the manufacturer. *Completed on-site. No further action required!*

❑ **Finding #4:** The following standardized recipes were missing pieces of critical information.

Corrective Action Needed:

- Update and submit the following standardized recipes:
 - Turkey & Gravy (12/13) - kitchen staff add chicken to the recipe, but chicken is not listed in the ingredients. Additionally, there are no instructions for how to prepare the dish. Update the standardized recipe with this information.
 - Ham and Cheese (12/14) - bun gram amount and crediting are incorrect and should reflect the actual products used.
 - Toasted Cheese (12/15) - two different recipes were sent prior to the on-site review. However, upon discussion with the Food Service Director, they are

preparing the Toasted Cheese sandwiches the same way at each site. Update the standardized recipe.

- Create and submit standardized recipes for:
 - Mashed Potatoes (12/13)
 - Tomato Soup (12/15)

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The 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>).

Allowable Costs

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) may be found our [Financial Management](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>, <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Alternate meals for students without funds to pay, that are provided free of charge, must have the entire meal cost funded from a non-federal source and are subject to nonprogram foods revenue regulation as food service may not absorb the meal cost.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category.

Corrective Action Needed: Please resubmit your 16-17 Annual Financial Report with revenues and expenses broken out by program and category. To do this, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** The nonprogram food revenue tool submitted was the 16-17 USDA yearly tool and it does not represent the correct food cost allocation for nonprogram foods.
Corrective Action Needed: Please watch the [Nonprogram Foods Revenue Tool webinar](#) (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html) and resubmit the [nonprogram food revenue tool](#) using a 5 day reference period including all nonprogram foods such as meals vended to other schools to calculate the ratio (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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.

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 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>).

Processes for complaints

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

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>).

Findings and Corrective Action Needed: Civil Rights

- **Finding #1:** The USDA Nondiscrimination Statement on the school direct certification letter is not the current long USDA statement, and the statement on the lunch and breakfast menus is not the current shortened statement.
Corrective Action Required: Please submit a copy of the direct certification letter with the correct USDA long statement. Please submit a copy of the February lunch and breakfast menus with the correct shortened statement. Completed on site no further action required.
- **Finding #2:** All staff and volunteers who have responsibilities for child nutrition programs have not had civil rights training.
Corrective Action Required: Please provide civil rights training for all program officials, staff, substitutes, and volunteers and submit the sign-in roster as corrective action.

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.
- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo [SP 56-2016](#) (<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>).
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](#) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

Findings and Corrective Action Needed: On-site Monitoring.

- **Finding #1:** The SFA did not use the current On-site monitoring forms to complete its monitoring of the NSLP and on-site monitoring was not completed for 50% of the breakfast sites.
Corrective Action Required: Please complete the current [on-site monitoring forms](#) for all NSLP sites in the SFA and 50% of the breakfast sites in the district (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc>).

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

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).
- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Wellness Policy

- **Finding #1:** The SFA's LWP has not been updated since it was created in 2006. It needs to specify the required components of the LWP to include: policy leadership, public involvement, school meals meeting regulations, foods sold outside of the school meal programs, foods provided but not sold, food and beverage marketing, goals for nutrition education, nutrition promotion and physical activity, other school-based strategies for wellness, triennial assessment and to inform the public of wellness policy updates and implementation. The [wellness policy resources](#) from DPI have valuable items such as the Wellness Policy Builder and the Wellness Policy checklist.

Brookwood's Local Wellness Policy meets the requirements.

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

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new "Smart Snacks" regulation that is effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our [Smart Snacks](#) webpage at (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our [Smart Snacks](#) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- At the time of the on-site review there were no competitive foods or beverages sold at Brookwood Elementary. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find more information on our [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Food Safety, Storage 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, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety

- Most recent Food Safety Inspections must be posted in publically visible location

Findings and Corrective Action: Food Safety

- **Finding #1:** Most recent food safety inspection not posted in a publically visible location at Brookwood Elementary School.

Corrective Action Needed: Please post the most recent food safety inspection in a publically visible location outside of the kitchen.

Buy American

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
 - If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
 - What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
 - Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
 - Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract](#)

[management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliance 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>).

Findings and Corrective Action Needed: Buy American

- ❑ **Finding #1:** The following products were identified in the SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Canned Mandarin oranges - China
- Frozen cauliflower – Mexico
- Canned diced peaches packed in fruit juice - Thailand

Corrective Action: The identified noncompliant food item(s) qualify to be on the non-compliant product list, but the SFA does not have a noncompliant list/process in place for tracking.

Begin using a [Noncompliant Product List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) for tracking nondomestic products

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>). Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action.

- **Label does not identify country of origin:**
In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the TA notes above for sample certification language. This will be treated as TA for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) 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 Lake Geneva Genoa, 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>).

Wisconsin School Day Milk Program

Commendations/Comments/Technical Assistance/Compliance Reminders

- Point of Service Counts (POS) for the Wisconsin School Day Program and the Special Milk Program must be recorded by who “did” take milk not by marking who “did not” take one.
- Per the Agreement in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid.

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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).