

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

School Food Authority: Linn Joint #4 School District

Agency Code: 64-7441

School(s) Reviewed:

Review Date(s): 1/24/18

Date of Exit Conference: 1/29/18

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](https://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](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills). [Food Service Director GOALS](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills/certificate-levels#director) (https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills/certificate-levels#director).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Linn Joint #4 for the courtesies extended to us during the on-site review. **The administrative assistant is amazing at what she has accomplished over the past school year with limited resources.** 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 those students eligible for free/reduced price meals in December, all were determined correctly, Direct Cert has been ran in the appropriate timeframes, and verification was conducted correctly. Kudos for a job well done!

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.

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:** The Public Release was not submitted to a local newspaper or distributed to local grassroot organizations (public libraries, food pantry, churches, etc.) and unemployment offices because SFA believed it was covered by Lake-Geneva. This is not the case as all SFAs must submit their own public release for their individual SFA.

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

- Per your online contract, checking off the students at the beginning of the line before they receive their meal, is considered an alternate point of service (POS). When this type of POS is utilized, there must be an adult at the end of the line who is able to determine if a reimbursable meal is taken.
- DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals every school day (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #1:** SFA utilizes an “alternate” point of serve and the person serving the meals has not been trained on reimbursable meal determination. Because the beginning of the line is very close to the

end of the line, the students who have selected a reimbursable meal are visible to the person checking off names and the students receive pre-packed meals, thus fiscal recalculation is not required.

Corrective Action Needed: Please move point of service to the end of the line after a reimbursable is selected, and update your online contract to reflect this change or train the server on reimbursable meal components to be the point of service. Please provide a statement of how this will be accomplished and the training that is provided to the server.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations/Comments/Technical Assistance/Compliance Reminders

Sincere thanks to the staff at Linn Joint #4 School District. We appreciate your time and efforts spent preparing for and participating in the off-site and on-site review. You and your staff were all a pleasure to work with!

Meal Pattern Responsibility with a Joint Agreement

- Although you are purchasing meals through a joint agreement, it is ultimately your responsibility, as the School Food Authority's (SFA), to ensure all meal pattern requirements are met. This includes an understanding of the requirements of the meal pattern and keeping on file, at your site, any documentation (e.g., crediting documentation and recipes) needed to ensure that meals delivered are compliant with the meal requirements.
- Information on meal pattern requirements can be found on the [NSLP Meal Requirements and Nutrition Assessment](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) page of our website (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Crediting

- Acceptable crediting documentation was not available for the products listed below. Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting. Work with your vendor, Lake Geneva-Genoa to gather crediting information for your site 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).
 - 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.
- A complete **CN label** includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that includes these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.
- 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. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).

- Current nutrition facts labels, CN labels, and/or PFS clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available on-site where meals are served, even if meals are prepared off-site. Documentation can be stored as hard copies or electronically. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted. CN labels and PFSs were not available on-site at Traver School.
 - This requirement is outlined in the joint agreement template, #12: *"The seller shall comply with all other requirements of their DPI agreement/application as it produces and makes available meals to the Purchaser, including providing the Purchaser with daily production/transport sheets indicating how menu items contribute to meal pattern requirements and supporting documentation for contribution."*
 - Please work with Lake Geneva-Genoa School District to obtain required documentation and keep these files on site.
- Remember to update records when new products are purchased or when product formulations change throughout the school year. More information about crediting documentation can be found on the [Meal Pattern Components](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

Crediting Using the Food Buying Guide

- Items that are not processed prior to purchase, such as raw meats, beans, eggs, fruits, vegetables, and milk, can be credited using the USDA [Food Buying Guide](#) (FBG). The FBG contains yield and crediting information for foods with standards of identity, such as those listed above. Foods that do not have standards of identity are not listed in the FBG and require further documentation.
- For more information on how to use the FBG, please see DPI SNT's [Food Buying Guide PDF](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/small-victories-food-buying-guide-presentation.pdf>).

Menu Substitutions

- Any changes to the planned menu must be documented on the production record. If products being used are different from the usual products, it is important to evaluate how the substituted products credit. For example, on the day of observation, the romaine salad leaves were not available and instead, iceberg lettuce with shredded carrots and cabbage was substituted. The romaine lettuce credits as a dark green vegetable, but the iceberg lettuce does not (it credits as an Other vegetable). Additionally, with the addition of the shredded carrots and cabbage it is necessary to obtain a product formulation statement to identify the creditable amount of each ingredient. This substitution did *not* result in a daily vegetable shortage. However, in the future, in order to avoid a weekly vegetable subgroup shortage, choose product substitutions within the same vegetable subgroup. If romaine is not available, you may substitute other dark greens such as spinach, butterhead (bibb) lettuce, kale, mesclun, or red leaf lettuce. Another choice would be to offer broccoli. All these are acceptable substitutions because they all are found within the dark green vegetable subgroup.
 - For additional vegetable subgroup information check out our [Vegetable Subgroups Handout](#) or visit our [Meal Pattern Components](#) webpage and click on the Vegetables quick link at the top of the page (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>)

Meal Pattern/Menu Planning Worksheets

- Menus must be planned to meet meal pattern requirements. Menu planning worksheets are very helpful tools for ensuring meal pattern requirements are met at lunch (particularly vegetable

subgroup requirements). Use the [K-8 School](#) (Lunch) template, which contains all the basic information needed to plan compliant menus for the selected age/grade group. You may also access them electronically on the [Menu Planning](#) webpage, under the Menu Planning Tools heading. [Instructions](#) for how to complete the worksheet are also found on the same webpage. (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

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 must be tailored to the food service operation.
- Guidance on what a standardized recipe should include can be found on our [Recipe Resources and Tools](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>) or [contact a Public Health Nutritionist](#) for assistance (<https://dpi.wi.gov/school-nutrition/directory>).
- Work with your vendor, Lake Geneva-Genoa, to 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) - the crediting and gram weight are incorrect for the bun.
 - 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 only using one of the recipes. Discard the recipe that is not being used, and update the recipe for the Toasted Cheese sandwich with the missing pieces of information as mentioned above.
 - Create standardized recipe for:
 - Mashed Potatoes (12/13)
 - Tomato Soup (12/15)

Signage

- The National School Lunch Program regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at lunch. It is required to post signage visible to the students that indicates the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination of fruit and vegetable.
- Signage was not posted at lunch to show students what constitutes a reimbursable meal. Technical Assistance was given, and a lunch menu and a DPI “Build a Healthy Lunch” poster was printed and posted at the beginning of the service line.
- If you wish to print larger signs or edit another one of our templates, visit our [Signage Resources](#) webpage. You may also order signage from the School Nutrition Team by visiting the [Team Nutrition](#) webpage and complete the Resource Order Form (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage; dpi.wi.gov/team-nutrition).

Transport Sheets

- 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 transport sheets provided prior to the on-site review. For lunch, transport sheets need the following information:

- Age/grade group, milk amounts, meals ordered and served for both students and adults (it was not clear what the numbers on the transport sheets represented), and temperatures when carts are loaded at production kitchen, on arrival to satellite kitchen and at meal service (some transport sheets provided for the week of review did contain the temperature information and some did not).
- It is not required that you use a specific transport sheet template, but it is recommended that you use the DPI [Transport sheet template](#), which contains space to enter all of the required information. These templates are found on our [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>)

CACFP

- It was noted that the 4k students are only at school for a half day and do not eat lunch. If this changes in the future, the 4k students will need to follow the updated Child and Adult Care Food Program (CACFP) meal pattern that was implemented on October 1, 2017. This 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](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Training

- It is recommended that anyone involved with the school meals program attend DPI training classes. Classes are offered in the summer and selected other times throughout the year. Numerous webcast training sessions are also available online. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the USDA requirements for the federal nutrition programs including verification, free/reduced applications, menu planning, production records, and record keeping requirements. Information on summer classes will be sent to School Food Authorities in late spring and is also available on the [DPI training](#) webpage (dpi.wi.gov/school-nutrition/training).

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. Thank you.

❑ **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: Work with your vendor, Lake Geneva-Genoa UHS, to correct this daily vegetable shortage. A different coleslaw product with a valid PFS may be used, discontinue the use of the product or you may count as an extra and not count the product

towards the meal pattern. Work with Lake Geneva-Genoa to write 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: Work with your vendor, Lake Geneva-Genoa UHS, to correct this insufficient weekly subgroup quantity. Work with Lake Geneva-Genoa to choose a different hummus product with a valid PFS to determine crediting, or discontinue the use of the product or you may count as an extra and not count the product towards the meal pattern. Work with Lake Geneva-Genoa to create 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 (information on menu planning worksheets is detailed above).

❑ **Finding #3:** The following standardized recipes were missing pieces of critical information, including: age/grade groups, recipe instructions, pans used, weight and/or volume measurements, equipment used, and serving utensils for proper portioning of the menu item. Work with your vendor, Lake Geneva-Genoa UHS, to correct these standardized recipes. Submit copies to the Public Health Nutritionist and keep copies on file at your site.

Corrective Action Needed:

- Update and submit the following standardized recipes:
 - Turkey & Gravy (12/13)
 - Ham and Cheese (12/14)
 - Toasted Cheese (12/15)
- Create and submit standardized recipes for:
 - Mashed Potatoes (12/13)
 - Tomato Soup (12/15)

❑ **Finding #4:** Signage was not posted at lunch to show students what constitutes a reimbursable meal.

Corrective Action Needed: Hang signage in the cafeteria explaining what a reimbursable meal is. *Corrected on-site. No further action required. Thank you!*

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

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

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf): <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** Annual Financial Report does not have any revenues or expenses allocated to nonprogram foods and the SFA sells adult meals and cold lunch milk.
Corrective Action Needed: Please provide a statement going forward that [all nonprogram food expenses and revenues](#) will be broken out from NSLP and allocated to the nonprogram foods line on the annual financial report (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).
- ❑ **Finding #2:** The district has no written unpaid meal charge policy which was required to be in place and distributed to families by July 1, 2017.
Corrective Action Needed: Develop a timeline for a written unpaid meal charge policy and distribution to households.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.

Findings and Corrective Action Needed: Nonprogram Foods

- ❑ **Finding #1:** Milk is given free to students who bring cold lunch. As these milks are not part of the reimbursable meal, they are subject to the nonprogram foods revenue regulation. If nonprogram foods are not charged to students at nonprogram food pricing, those costs must be covered by nonfederal sources such as the general fund as the nonprofit food service fund may not absorb the costs of nonprogram foods.
Corrective Action Needed: Please submit a plan as to how the cost of these extra milks will be covered and accounted for. If it is decided to keep providing free milk to students, please track the milks served and reimburse the food service account for these milks from nonfederal funds.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

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.

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered.

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.

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:

- Finding 1:** Civil Rights training was not complete for all persons administering the food service program.
Corrective Action Required: Please provide civil rights training for all employees administering child nutrition programs.
- Finding 2:** And Justice for All poster not posted in a publically visible location.
Corrective Action Required: Please post the And Justice for All poster not posted in a publically visible location. Completed on-site, no further action required.
- Finding 3:** The shortened USDA Nondiscrimination Statement on the menu is not the current statement.

Corrective Action Required: Please submit the February menu with the correct statement printed on it as corrective action. Completed on-site, no further action required.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

- Local wellness policy contains all of the required elements.

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

- At the time of the on-site review there were no competitive foods or beverages sold at Traver 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](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>).

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

Professional Standards: Training Requirements

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

Annual Training Requirements for All Staff

Directors: 12 hours

Managers: 10 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

Findings and Corrective Action: Professional Standards

- **Finding #1:** The School Nutrition online contract does not have correct person listed as food service director.
Corrective Action Needed: Please update the contract with the administrative assistant as the food service director.
- **Finding #2:** Staff have not completed the required training hours for the current school year and was unable to provide a training plan for the current school year.
Corrective Action Needed: Provide a training plan for meeting the required training hours for the food service director, the server, and person who does the check-off sheets. Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

[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/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Plans

- Food Safety inspections must be posted in a publically visible location.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- All food service employees must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf>).

Time Temperature Control for Safety

Milk and dairy products

Shell eggs

Meat (beef, pork, and lamb)

Poultry

Fish

Shellfish and crustaceans

Baked potatoes

Heat-treated plant food, such as cooked rice, beans, and vegetables

Tofu or other soy protein

Sprouts and seed sprouts

Sliced melons

Cut tomatoes

Cut leafy greens

Untreated garlic-and-oil mixtures

Time as Public Health Control

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

limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.

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

Findings and Corrective Action: Food Safety

- **Finding #1:** The current Food Safety inspection not posted in publically visible location.
Corrective Action Needed: Please post the current food safety inspection in a publically visible location. Corrected on-site, no further action required.
- **Finding #2:** The food safety plan does not contain all of the required elements.
Corrective Action Needed: Please update the food safety plan to include all of the required elements and a standard operating procedure for Time as a Public Health Control, and submit the plan in electronic word document form as corrective action.
- **Finding #3:** Missing “employee reporting agreement” for all food handlers.
Corrective Action Needed: Please have all food handlers sign an employee reporting agreement and submit copies as corrective action.

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).
 - **If the SFA receives any nondomestic products, these products must be recorded on a Noncompliant Product List. A [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is located on the procurement webpage** (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).
 - **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.

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).