

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

School Food Authority: Hartford Joint #1 School District Agency Code: 662443

School(s) Reviewed: (50) Rossman Elementary

Review Date(s): 01/08/19 - 01/09/19

Date of Exit Conference: 01/09/19

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. 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 Hartford Joint #1 School District for the courtesies extended to us during the review. Staff were available to answer questions and receptive to recommendations and guidance.

The review team noticed a strong collaborative effort between the district staff and the food service department to provide meals, issue benefits, and make decisions in the best interest of students. The food service director has years of experience and goes above and beyond basic program requirements by conducting various nutrition education events and coordinating multiple vended meal agreements. These agreements are not only benefiting this district, but also the buying schools. The Authorized Representative is supportive and responsive to the needs of food service and seeks department input for decision making where appropriate. These combined efforts are surely contributing to the overall success and fiscal health of the food service program. Keep up the good work!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

300 eligibility determinations were reviewed, 6 errors were identified. The error rate is below the threshold which requires fiscal action, but all errors will need to be corrected. The agency will *not* need to conduct an independent review of applications during the 19-20 SY.

Free and Reduced Price Meal Application Determination

When an application only has one frequency of income reported, the income should not be converted to annual. When using the [Income Eligibility Guidelines](#) look at the amount of 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>).

Disclosure

Any individual that is provided with identifiable student eligibility information for state and federal reporting purposes should complete the [Disclosure Agreement Form for School Staff](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>) and retain a copy on file at the district.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** An error made in August during the annual software carryover process resulted in some students receiving an inaccurate meal benefit. Current year benefit determinations were overrode with the 17-18 SY status.

Corrective Action Needed:

- a) Submit a statement outlining how the carryover process will be handled in future years to prevent this error from reoccurring.
- b) Send a communication to all households affected, making them aware of the error and how the situation will be remedied. Submit a copy of this communication to the consultant. If there are students receiving paid meals that should have been free or reduced, the district may amend past

claims (September- December) *only if households have been refunded*. All other errors, will be addressed through the review process.

❑ **Finding #2:** Certification and benefit issuance errors as indicated on the SFA-1 and SFA-2 forms.

Corrective Action Needed: Send a notification to the households communicating their change in meal benefits. An increase in meal benefits must be made within 3 *calendar* days. A decrease in benefits must be provided with 10 *calendar* days to appeal prior to changing their benefit in the point of sale, **unless the error is the result of a carryover benefit that should have expired. These household do not have appeal rights, but should be encouraged to apply for current year benefits.**

- a) Submit a copy of the completed SFA-1 and SFA-2 forms to the consultant with the date of correction column completed.
- b) Include a copy of the letter sent to each household. The date of correction is the date the letter is sent to the household.

Verification

No errors. Great job!

Meal Counting and Claiming

Non-review CESA site and field trips meals:

All meals claimed for reimbursement must be counted, recorded, consolidated, and reported through a system that *consistently* yields accurate claims. Meals must be claimed *at the point of service* where it can be determined that the student has all components required for a reimbursable meal. This can be accomplished by sending a student roster list with the bag lunches. An adult should check-off the student name *as they receive the meal* and return the completed form to food service. Food service would then enter the completed form into the POS system. This ensures meals are claimed by participation and not by forecast.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff of Hartford Joint #1 School District for their warm welcome, cooperation, and time during the Administrative Review. A special thanks to the Food Service Director for providing documentation prior to the on-site visit. The school nutrition professionals are friendly and work well together and with the students.

The Food Service Director does an exceptional job of implementing nutrition education and nutrition opportunities, such as Harvest of the Month, school gardens, Kids in the Kitchen, and other types of lessons and take-home activities. There are colorful pictures of fruits and vegetables in Rossman Elementary's cafeteria, making it a welcoming space and extension of the classroom that promotes good nutrition.

There were no meal pattern findings during the week of review or on the days of on-site observation. All meals observed were reimbursable. We enjoyed our time at Hartford Joint #1 School District. Thank you for your hard work and dedication to your School Meals Programs!

Technical Assistance

Production Records

It is important to be specific on production records about the identity, brand, and description of the items served. Different types of cereal and graham crackers are offered at breakfast. Instead of writing “cereal” or “graham crackers”, list the type/brand of cereal or graham crackers offered. “Cereal” or “graham crackers” does not indicate exactly which product was offered.

Breakfast Signage – Food Items

Under Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered, but only three food items, one of which is ½ cup fruit, vegetable, or combination, must be selected in order for the meal to be reimbursable. A food item is defined as 8 fluid ounces (fl oz) of milk; ½ cup of fruit (or ½ cup of vegetable can be substituted for fruit) and 1.00 ounce equivalent (oz eq) of grain (or 1.00 oz eq of meat/meat alternate can be substituted for grain, after 1.00 oz eq of grain has been offered for the day).

During breakfast service observation, it was noted that the 2.00 oz eq cinnamon roll entrée and 2.00 oz eq cereal and graham crackers entrée were both listed on breakfast signage as 1 food item, even though the Food Service Director and school nutrition professionals intended to have these options credit as 2 food items. Technical assistance was provided to the Food Service Director and school nutrition professional who is in charge of the breakfast signage on how to complete this portion of the posted breakfast signage. Examples of how listing each option as 1 food item versus 2 food items and how this effects students’ selections under Offer Versus Serve were provided.

Offer versus Serve Training

While all meals observed during breakfast and lunch service were reimbursable, it appeared there was some confusion and uncertainty about OVS requirements when speaking with the school nutrition professionals. The school nutrition professionals and Food Service Director report that OVS training has been completed this school year. Please consider adding a refresher OVS training for both breakfast and lunch at your next staff meeting, if possible. Additional OVS training would be beneficial.

Fruit and Vegetable Bar Signage

Certain types of fruits and vegetables on the fruit and vegetable bar are selected using tongs. If a portioning utensil cannot be used to serve certain fruits and vegetables, such as grapefruit slices, signage can be utilized to let students know how many pieces, or grapefruit slices in this example, they can select to have the full planned portion size of ¼ cup. Examples of this type of signage and printable signage can be found on DPI SNT’s [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage under the Salad Bar Signage heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Findings and Corrective Action Needed for Meal Pattern and Nutritional Quality

❓ Finding #1: Standardized recipes are required for all menu items that have more than one ingredient. There were not recipes available for the following menu items: mashed potatoes, gravy, teriyaki chicken bites, and brown rice. Even though there are instructions listed on the back of the packages, these recipes should be standardized to meet each food service operations’ needs.

In addition, all standardized recipes must include detailed information about the specific ingredients, products, equipment, and procedures used to prepare the recipes. A standardized recipe produces a consistent quality and yield every time when the exact procedures, equipment, ingredients, and products

are used, which is especially crucial for crediting recipes in School Meals Programs. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen.

The following recipes did not accurately reflect the products and procedures that were used during the week of review: taco meat, beefy nachos, and Mexican street corn salad. There were additional recipes that did not always have the correct product numbers listed. Even though a product may be similar, the crediting of that product may be different, changing the intended crediting of the recipe and can potentially lead to not meeting daily and weekly meal pattern requirements.

Corrective Action Needed: Submit standardized recipes for mashed potatoes, gravy, teriyaki chicken bites, and brown rice. Submit updated standardized recipes for taco meat, beefy nachos, and Mexican street corn salad.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance (TA)/Compliance Reminders

Annual Financial Report (AFR)

The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.

Expenses

The food service account should record only *direct* costs. Direct costs are those expenditures relating to the food service operation. Such costs are readily identified; food, labor, equipment, purchased services, and other supplies. An accurate break down of expenditures for labor/benefits, food, equipment, purchased service, and other costs by program (breakfast, lunch, and nonprogram foods) is necessary for good program management and the completion of the Annual Financial Report (AFR).

The food service management company will need to code vendor invoices by program and expenditure category so that the district can code and record expenses properly in Fund 50. A list of [Standard WUFAR codes for Fund 50](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/wufar_codes_sy1718.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/wufar_codes_sy1718.xlsx) and a chart of [expenditure categories](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc) is posted on the [SNT Financial Website](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Unpaid Meal Charges

- Consider discontinuing the practice of providing negative meal balance reminders while students are in line during meal service. This is a discouraged action as it may embarrass or single out a student. The encouraged action is to communicate *all* negative meal balance reminders to an adult household member via phone, email, or mailings.
- Reviewer discussed the removal of language on page 2 of the unpaid meal charge policy. This statement does not reflect the actual practice of the agency and is also an unallowable practice as stated.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

✓ **Finding #1:** The AFR does not reflect the correct beginning fund balance and total nonprogram food revenue. Therefore, the ending fund balance is also incorrect.

Corrective Action Needed: Correct the 17-18 SY AFR and submit the paper adjustments to the consultant. The DPI accountant will enter the corrected report into the online system.

Corrected. No further action required.

✓ **Finding #2:** Direct expenses are not recorded by program and expenditure category within Fund 50. This complicates the district’s ability to accurately complete the Annual Financial Report (AFR).

Corrective Action Needed: Submit a statement agreeing to track direct expenses by program and expenditure category. In order to do this, the district must reconcile all vendor invoices with the monthly FSMC invoice. The FSMC should code vendor invoices so the district bookkeeper knows which items were purchased for the NSLP, SBP, and Nonprogram foods. For expenses that are shared among programs (e.g., oven repair cost), SFAs may use the [expenses allocation tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/expense-allocation.xlsx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/expense-allocation.xlsx>) posted on the SNT website.

Corrected onsite. No further action required.

Paid Lunch Equity (PLE)

The agency is in compliance and utilized the 18-19 SY flexibility.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food revenue ratio regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

Note: Compliance with nonprogram foods was assessed during the audit to meet the revenue ratio requirement by first including all nonprogram food sales, which showed non-compliance despite the agency covering the full cost. Per [SP 20-2016 Q#11](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>), current vended meal/catering operations were removed from the calculation and in doing so, showed that the agency is in compliance with the remaining non-program food sales (adult meals, extra milk, a la carte sales). Records were supplied to justify that the current price of vended meals/caterings is generating enough revenue to cover the full cost.

Q11: How should costs and revenue from catering, vended meals, or purchasing for other entities be included in this assessment?

A: Due to potential complexities of accounting for food cost and revenues from catering, vended meals, or purchasing for other entities, including these costs and revenues during a reference period is not required.

SFAs may choose to include these costs/revenues to simplify the assessment. SFAs including these food service activities in their assessment MUST include BOTH the food costs of providing these services and the revenues generated in the calculations for the selected reference period.

If the revenues from these activities are not included in the calculation of the total revenue and cost ratios, SFAs must be able to provide proper documentation, such as purchase agreements, invoices, the agreement with the entity and information demonstrating the recovery of the full costs.

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The 18-19 SY reimbursement rates should be used to determine adult prices for the 19-20 SY.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance (TA)/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.

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. 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>)

- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

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

Findings and Corrective Action Needed: Civil Rights

- Finding #1:** The authorized representative and determining official did not complete civil rights training.

Corrective Action Required: Review the School Nutrition [Civil Rights Training PowerPoint](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>). Sign off on a attendance record and/or submit the date of completion via email to the consultant. Retain records of completion and count the time towards annual Professional Standards hours.

On-site Monitoring

Technical Assistance (TA)/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; this is due by February 1. The new CESA site is also subject to on-site monitoring reviews and is recognized as an independent serving location on Schedule A of the online contract.

Local Wellness Policy

Commendations/Comments/Technical Assistance (TA)/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 2016-17 with full compliance of the final rule by June 30, 2017.

Content of the Wellness Policy

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).

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).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, a LWP minimum requirements checklist, and report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding #1:** SFA LWP meets some but not all requirements as stipulated above.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule. The current policy is missing language related to:

- Public Involvement;
- Completion fo a Triennial Assessment;
- And how the agency will update and inform the public on LWP changes

Smart Snacks in Schools

Commendations

Congratulations to Rossman Elementary and Lincoln Elementary of Hartford Joint #1 School District on being silver award winners of the HealthierUS School Challenge 2011-2015!

Rossman Elementary is compliant with all Smart Snacks regulations. Rossman Elementary sells entrees, second entrees, and milk a la carte only on the planned service day and do not have any other food or beverage sales during the school day, such as vending machines or fundraisers.

Technical Assistance

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 sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented.

Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

The Smart Snacks standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (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.

Findings and Corrective Action Needed: Smart Snacks in Schools

No findings.

Professional Standards

Technical Assistance (TA)/Compliance Reminders

Training Requirements

- 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, substitute, 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 webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

- ❑ One representative from the SFA must complete 12 hours of Food Service Director Professional Standards Training hours.

Findings and Corrective Action: Professional Standards

- ❑ **Finding #1:** The authorized representative and determining official are not documenting and have not met training hours for the current school year.

Corrective Action Needed: Provide a plan for meeting annual training hours. Both positions need training in job specific areas, which may or may not add up to a full 4 hrs/year. Civil Rights Training must be completed annually and will count towards your hours.

Water

The agency is in compliance.

Food Safety and Storage

Technical Assistance/Compliance Reminders

The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.

Findings and Corrective Action Needed: Food Safety

- ❑ **Finding #1:** Staff at Rossman El are not following procedures outlined in SOP #21 and/or taking steps to correct the chemical concentration of sanitation buckets according to the manufacturer's instructions.

Corrective Action Needed: Re-train staff on SOP#21 and the steps necessary to correct an over concentrated sanitizing solution. Submit an attendance record.

Buy American

Commendations:

Hartford Joint #1 School District uses the WI DPI Buy American Non-Compliant Product List template for items with countries of origin that are not the USA. Excellent job! Technical assistance was provided on how to more accurately fill out these forms by putting the country instead of the region and the actual months instead of the season for the seasonality reasoning.

Compliance Reminders:

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

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

Technical Assistance:

Non-Compliant Products Found Onsite

The following products identified in Hartford Joint #1 School District's storage areas did not have proper labeling to identify the country of origin:

- Lincoln Elementary (where Rossman Elementary's meals are prepared/sent from)
 - Yellow round tortilla chips- MN
 - Chocolate bear grahams- HI
 - Soy bean oil- marketed by
 - BBQ sauce- IL
 - Mayo- IL
 - Oregano- marketed by
 - Cilantro flakes- distributed by
 - Fruit juice- MN
 - Baked beans- TN
 - Tortilla- MN
 - Bagels- NJ
 - Butter- marketed by
- Rossman Elementary
 - Croutons- CA
 - Cheerios- distributed by
 - Ranch dressing- distributed by
 - French dressing- distributed by
 - Fruit juice- MN
 - Brekkie- manufactured by
 - Cinnamon roll- manufactured by
 - String cheese- marketed by
 - Butter- marketed by

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

Achieving Buy American Compliance

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51 percent of its agricultural food component, by weight or volume, from the U.S." This can be accepted in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected

distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.

- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (<https://dpi.wi.gov/school-nutrition/procurement/procurement-manual>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed for Buy American:

No findings for the Buy American section.

Reporting and Recordkeeping

The agency is in compliance.

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

Breakfast Promotion

Breakfast participation is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>). A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

Summer Meals

The agency is in compliance.

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).”



With School Nutrition Programs!