

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

School Food Authority: Slinger School District

Agency Code: 665390

School(s) Reviewed: Allenton Elementary

Review Date(s): 1-29-19

Date of Exit Conference: 2-11-19

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 Slinger School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff at Slinger School District for their willingness to make changes to meet school nutrition program regulations. It was obvious the staff at Allenton Elementary cares for the well-being of their students. They served a great meal, always with a smile, and have a great relationship with the students. We especially enjoyed the fun marketing and we were impressed with how well the students understood what makes a meal. Awesome job and thank you for what you do for kids!

The DPI review team is confident that Slinger School District will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

290 eligibility determinations were reviewed. Two applications require further review to determine if eligibility was obtained correctly. The income on several applications was converted to annual income when it should not have been. This did not result in a determination error. No corrective action is required at this time. Thank you for running the Direct Certification matches in the required time frames.

Free and Reduced Price Meal Applications

- When an application only has one frequency of payment, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find

the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).

- 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](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- **Finding #1:** Local officials with access to free and reduced data do not have USDA disclosure agreements on file.

Corrective Action Needed: Submit copies of the signed [disclosure agreement form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>) for anyone working outside of food service, who is determined to need access to this information (e.g., IT, secretaries handling local fee waivers, staff handling state/federal reporting individual F/R data). The goal is to limit the number of people who need to know this information and make sure these individuals understand the consequences of improper sharing/release of this information.

Note: aggregate data (just F/R numbers or percentages without a connection to individual names does not require prior parental sign-off before sharing and often times satisfies the request).

Meal Counting and Claiming

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

- The meal claim for the Review Month was conducted using the Skyward Accuclaim report.
- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.

Findings and Corrective Action Needed: Meal Counting and Claiming

- **Finding #2:** There was an over claim of one meal in the paid category at the high school.
Corrective Action Needed: This is a non-systemic error and will not require further claiming information to be provided. No further action is required.
- **Finding #3:** At breakfast meal service, some students were marked as taking a meal as they entered the cafeteria before receiving their meal.
Corrective Action Needed: Submit a statement that students will be charged for a meal only after they have received the meal and it has been verified reimbursable.
- **Finding #4:** Field trip meals are being charged to student accounts from the morning roster.
Corrective Action Needed: Submit a statement of how students on field trips will be marked as taking a meal only after they have received the meal and it has been verified reimbursable.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

The food service professionals at Slinger School District are doing a wonderful job planning and serving healthy, appealing meals to students. Thank you to the dietitian and food service director for providing documentation prior to the review in a timely and organized manner, and for being open to suggestions and new ideas during the onsite review. The nutrition professionals at Allenton Elementary were positive, friendly, efficient, and have a great rapport with students. They also maintain an immaculate and organized kitchen. Keep up the good work!

Comments/Technical Assistance/Compliance Reminders

Offer versus Serve (OVS)

- It is a good idea to periodically retrain staff on OVS requirements outside of an annual back-to-school training. Helping staff to understand how the pre-portioned fruits and vegetables credit each day can ensure that reimbursable meals are served. During lunch observation there was a bit of confusion regarding the ½ cup of Romaine salad, which credits as ¼ cup of vegetable. Leafy green vegetables credit as half the volume served. See the [OVS](#) section of our website for more information and training resources (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ Finding #1: There was a daily vegetable shortage on two days during the week of review. On Tuesday, December 11, the only vegetable offered was ½ cup of broccoli/carrots. On Friday, December 14, students who took the Uncrustable entrée option were offered ½ cup carrots as their only vegetable. Grades K-8 must be offered ¾ cup vegetable each day.

These shortages were fixed prior to the onsite review with the addition of a ½ cup Romaine/iceberg salad (crediting as ¼ cup vegetable) offered daily to all students. This was confirmed by meal observation and review of production records while onsite.

Repeat violations of a daily vegetable shortage during subsequent Administrative Reviews may result in fiscal action.

Corrective Action Needed: No further action needed; ¼ cup vegetable added daily prior to the onsite review.

❑ Finding #2: During the week of review (December 10-14, 2018) there was a weekly grain shortage due to a daily Uncrustable entrée option that only provides 1 oz eq of grain.

Fiscal action is required for select repeat violations found during an Administrative Review (AR). Because the weekly grain shortage was found during the last AR as well as the current AR, fiscal action will be applied. There will be a re-claim for meals for one weekday with the lowest participation at each site with the weekly grain shortage. The following finding was documented from the School Year (SY) 2014-15 AR, which is a repeat finding during the current AR:

- *“As the PBJ Jamwich entrée alternative which credits 1 oz eq M/MA and 1 oz eq grain is offered at lunch daily, it must be offered with an additional 1 oz eq M/MA food item and an additional 1 oz eq grain at least three days per week to meet the weekly minimum requirement of 8 oz eq for each of these components.”*

This shortage was fixed prior to the onsite review with the addition of 0.5 oz eq WGR croutons (as part of the daily salad) offered daily to all students. This was confirmed by meal observation and review of production records while onsite.

Since fiscal action must be assessed for each site with the weekly grain shortage, **please provide lunch production records for Addison Elementary and Slinger Elementary for the week of December 10-14, 2018.**

Corrective Action Needed: No further action needed; 0.5 oz eq grain added daily prior to the onsite review.

❑ **Finding #3:** The electronic signage posted in the cafeteria at Allenton looks fantastic and includes the requirement to select ½ cup fruit and/or vegetable; however, it must communicate the Offer versus Serve (OVS) requirement that students must select at least three food items at breakfast.

Corrective Action Needed: Please submit a photo or screenshot of updated breakfast signage to show that the complete OVS requirement is communicated via signage.

❑ **Finding #4:** Certain pieces of information on production records are not consistently filled in, including serving sizes of fruit and planned and actual number of meals prepared. Milk, juice, and cereal usage has not been recorded by type. Technical assistance was given on production record requirements and the option to use recipes to supplement production records for cereal and juice. To create a cereal recipe, the nutrition professional would keep track of cereal usage by type for one week to determine the average number of each type of cereal served. This recipe would need to be updated at least twice per school year, or when it is noticed that students' preferences change. The recipe would be kept on file as a supplement to production records. Total cereal usage would still need to be recorded daily.

If it becomes too time- or labor-intensive to record milk usage by type on production records, you may consider using a [Milk Recipe](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc). A milk recipe is documentation of average milk usage by meal (breakfast or lunch) and grade group. When a milk recipe is on file, total milk usage must still be recorded on production records. Milk recipes must be updated twice per year or when you notice that students' preferences have changed.

More information can be found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

Corrective Action Needed: Please submit one week of completed breakfast and lunch production records.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

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

Annual Financial Report (AFR)

- Under "nonprogram foods", report the revenues and expenses for any food items that are not claimed as part of the reimbursable meal such as second entrees, adult meals, a la carte, and caterings.

Allowable Costs

- The nonprofit school food service account is to be used only for the operation of the school meal program including food, supplies, equipment and personnel.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our [Financial Management](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs 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>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Bad debt is an unallowable expense to the food service program (see allowable costs section above). It is recommended the SFA have a procedure in place for determining when delinquent debt will become bad debt.
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- **Finding #5:** The SFA has a written unpaid meal charge policy; however, the policy is not currently being followed. The SFA is in the process of examining the policy to determine if it meets their needs.

Corrective Action Needed: Please develop a timeline for when the unpaid meal charge policy will be finalized and distributed, in writing, to all households and staff responsible for enforcing the policy.

Revenue from Nonprogram Foods

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

Revenue from Nonprogram Foods

- 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 including adult meals and second entrees must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. It is highly recommended to complete the [DPI Nonprogram Food Revenue Tool/Calculator](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) yearly to aid 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>).

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](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>)
- [Nonprogram Foods In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)
- [Nonprogram Food Revenue Webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#nfr) (<https://dpi.wi.gov/school-nutrition/training/webcasts#nfr>)

Findings and Corrective Action Needed: Revenue from Non-program Foods

- **Finding #6:** Many items sold to outside organizations or for catering purposes are being sold at invoice cost or at a very low markup when all costs for non-program foods, including food, labor, equipment, and purchased services must be covered so student meals are not subsidizing non-program foods. The nonprofit foodservice account cannot be used as a ‘pass-thru’ account.
Corrective Action Needed: Set a standard markup and price list for all items supplied to entities outside of foodservice. Submit a statement of how you plan to make sure all non-program food costs are covered and a timeline of when new price guidelines will be in place.

Indirect Costs

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

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, waste costs, pest control, rent, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures – time study based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total (i.e., yearly weight study, square footage).

Findings and Corrective Action Needed: Indirect Costs

- **Finding #7:** Indirect costs in the form of pest control for the entire school district are being charged to the nonprofit school food service account, which is unallowable in Wisconsin.

Corrective Action Needed:

1. The cost for pest control must be turned into a direct cost for foodservice only. This could be determined by using the supplier’s methodology for billing and assigning a portion to foodservice (ie.square footage) OR separate billing for food service only.
2. Submit documentation of actual costs for foodservice and how these costs were determined.
3. Submit accounting documentation for all pest control amounts charged to the nonprofit foodservice account from July 2017 through January 2019.
4. Once the direct cost amount is determined and approved, the difference will need to be refunded to the nonprofit school food service account for SY 2017-18 through the Administrative Review. Submit the accounting documentation showing this amount has been deposited to fund 50.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance (TA)/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 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 or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” The format of either of these statements cannot be altered and must be in the same size font as the main text in the document.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits.

And Justice for All Poster

- “And Justice for All” posters need to be posted in where the public can view the poster throughout the school day, in the place where meals are served.

Findings and Corrective Action Needed: Civil Rights

- **Finding #8:** The notification letters contained the incorrect nondiscrimination statement.
Corrective Action Required: This was corrected immediately onsite. No further action is required.

- **Finding #9:** Meal prices for student meals were visible on the computer screen that can be seen by students; this constitutes overt identification.
Corrective Action Required: This was corrected immediately. No further action is required.

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.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

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>).

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) 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: Local Wellness Policy

- **Finding #10:** SFA LWP meets some but not all requirements.
 1. **Policy Leadership:** SFAs are required to identify an official responsible for oversight in the written policy. This can be a specific position/title instead of a specific name.
 2. **Public Involvement:**
 - SFAs are required to actively seek members for the wellness committee that represent a diverse group and allow them to participate.
 - SFAs are required to include language in the policy pertaining to allowing the public to participate in the development, implementation and review of the LWP.
 - SFAs are required to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are encouraged to use various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of 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>).
 3. **Triennial Assessment:**

- SFAs are required to include language in the LWP regarding the completion of an assessment every three years.
 - The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy).
4. **Update/Inform the Public:** The written LWP must include language specifying how the SFA will update and inform the public about the content and amendments of the policy.
 5. **Food and Beverage Marketing:** SFAs may only market products that adhere to Smart Snacks guidelines during the school day and are required to include language related to this in the written policy such as "all food or beverage products marketed to students and/or depicted on items/equipment on the school campus, during the school day, must meet Smart Snacks nutrition standards".

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

Recommendations for updating the policy:

- Although the school store at Slinger High School wasn't viewed, documentation shows food items not meeting the Smart Snacks nutrition requirements are being displayed during the school day and marketed during announcements. Many items sold in the store are high in sodium, sugar and calories.
- It is recommended that the operators of this school store reevaluate whether the sale of those items is in line with the school's wellness goals. Even if these items are sold during approved timeframes, persistent marketing and sales of unhealthy snacks may detract from healthy meals offered in the NSLP.
- It is recommended SFAs review sales of non-foodservice items during meal service and how they affect the foodservice program.
- Identify specific goals for Nutrition Education, Nutrition Promotion and Other School Based Strategies for Wellness.

Smart Snacks in Schools

Comments/Technical Assistance/Compliance Reminders

Smart Snacks Rule

At the time of the on-site review there were no competitive foods or beverages sold at Allenton Elementary besides milk and the snack pack items that are part of the reimbursable breakfast. 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 fundraiser tracking tools 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).

Food Safety and Storage

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

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date. Storage areas were clean and organized. Great job!
- Food safety inspection reports must be posted where the public can view the poster throughout the school day.

Findings and Corrective Action: Food Safety

- **Finding #11:** Standard operating procedures (SOPs) are not site-specific. Non pertinent SOPs include those related to transporting, vending machines and milk barrels.

Corrective Action Needed: Remove SOPs that are not pertinent to site-specific procedures. Submit a statement indicating the food safety binder has been updated.

Buy American

Comments/Technical Assistance/Compliance Reminders

Slinger School District has a thorough Buy American Noncompliance List on file, as well as supporting documentation from manufacturers to support exceptions to the provision. Nice work!

Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. 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% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted in an email. Technical assistance was given on checking your distributor's website to see if products are identified as being products of the U.S.

More information can be found on our [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Reporting and Recordkeeping

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

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

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

Breakfast Promotion

The breakfast program for the SFA has low participation; therefore, it is suggested that ideas for increasing participation and adding breakfast offerings be considered. One idea would be to look at offering breakfast in the classroom. A mid-morning breakfast model (either out of the kitchen or in the classroom) has been found to be very successful at the middle school and high school levels. 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>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf)

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 Slinger School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](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)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action: SBP and SFSP Outreach

- **Finding #12:** Summer Meals outreach has not been done.
Corrective Action Needed: Please submit a plan for Summer Meals outreach for the 2019 summer months.

Carolyn Stanford Taylor, State Superintendent for Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. Her 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!