

# USDA Child Nutrition Programs Administrative Review Summary Report

---

**School Food Authority: Oconomowoc Area School District      Agency Code: 674060**

**School(s) Reviewed: Ixonia, Nature Hill Intermediates**

**Review Date(s): 01/23/2017-1/27/2017**

**Date of Exit Conference: 1/27/2017**

---

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 webpage [dpi.wi.gov/school-nutrition/training](http://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 webpage [dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage [dpi.wi.gov/school-nutrition/national-school-lunch-program/financial](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial), scroll down to the unpaid meal charges section.

## **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Oconomowoc School District for the courtesies extended to us during the on-site review. Thank you to the food service director for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The staff at both schools did a very nice job of

presenting meals and offered a friendly environment for students. It is a great asset for the district to have a chef in house to assist the director with the school meal program.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Commendations

Applications were organized and well maintained. Information was available on request. Food service director and secretary were very helpful in answering questions and assisting with eligibility and determining process.

#### Comments/Technical Assistance/Compliance Reminders

##### **Public Release**

All School Food Authorities (SFAs) are required to distribute a *Public Release* before the start of the school year. SFAs should send the public release to media and grassroots organizations. In addition, SFAs should send the release to major employers contemplating or experiencing large layoffs and local unemployment offices, as applicable. SFAs are not required to pay to have it published but must maintain documentation of whom the release was sent to along with the specific materials distributed. Note, the *Public Release* cannot be posted to the SFA's website and/or district handbook. **Technical assistance** was provided as to the time frame to distribute the public release.

##### **Applications**

Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application. Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official. **Technical assistance** was given regarding applications being reviewed in a timely manner.

When an application only has **one frequency of payment** indicated for all of their reported incomes on the application, you should **not** convert it to annual, but using the Income Eligibility Guidelines <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility-guidelines-1617.doc>, you would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).

When benefit eligibility status increases, the change must take place within 3 days. When benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action must be sent in writing with appeal rights procedures.

##### **Alternative Applications**

The Alternate Household Income Application is a way to collect socio economic data from students in CEP schools or schools that may have a school not in the program. Please keep in mind that processing alternative applications must not be a food service expense and needs to come from another fund to cover cost of processing. **Technical assistance** was provided as the school does use alternative applications for its High school that is not in the NSLP.

##### **Household Size Box**

As a reminder, for the household income size box:

If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made. **Technical assistance** was provided regarding the household members box.

If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional office, any application that does not have this box completed is considered an incomplete application. **Technical assistance** was given.

### **Incomplete Applications**

Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including email. The determining official should document the details of the conversation, date, and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application. **Technical assistance** was provided regarding this.

### **Effective Eligibility**

The *Eligibility Manual for School Meals* provides that the determination, notification, and implementation of free or reduced price meal status be made within ten operating days from the date the application is received by the LEA. **Therefore, if the LEA chooses, it could establish the date of submission of an application as the effective date of eligibility, rather than the date the official approves it.** This flexibility applies to eligibility determinations made through the application process only, and only to complete applications containing all required information at the time of submission. See SP 11-2014 for more information. The School Nutrition Team must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at [karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov) for more information and approval. **Technical assistance** was given.

### **Limited English Proficiency (LEP)**

Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency. To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian. The FNS website offers the application materials in 49 languages <http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.

### **Annual Income**

If the household provided only annual income, the LEA must follow up with the household to ensure that the amount is an accurate reflection of the household's current income. **Technical assistance** was provided to follow up on applications that list only annual income and to document the follow-up call.

### **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.

### **Direct Certification**

Direct Certification (DC) is required to be run by SFAs participating in the USDA Child Nutrition Programs (CNP) three times per year to determine meal eligibility. We understand that this information is often also useful when reporting for other purposes, such as Title 1 reporting. The following questions have been clarified by USDA for schools not participating in any CNPs. **Can a district run DC** for their total student population, including students enrolled in schools that are not participating in any CNP? For example, the elementary and middle school participate, but the high school does not. **Yes**, it is allowable for the SFA to run DC matches for the entire student population.

### **Verification**

When applications are chosen for verification, the person designated as the Confirming Official should be reviewing these applications prior to contacting the family to ensure the initial determination is correct. There is a place for the Confirming Official to sign and date on the back of the application. **Technical assistance** was given.

Three applications were selected for verification. Two applications were incorrectly verified and will require additional follow up with the household. The errors were recorded on the *SFA-1 Eligibility Certification and Benefit Issuance Error Worksheet* coded as A2 and G. **Technical assistance** was given.

### **Findings and Corrective Action Needed**

**Finding #1:** It was found that there were students on the benefit issuance list that received benefits that should not have been. There was no supporting source documentation for those students listed.

**Corrective Action Needed:** Please review the benefit issuance list and remove any students that do not qualify for meal benefits. Please contact families to let them know there is a change of benefits. Please check software for any issues relating to this issue. Fiscal action will be applied for those who were listed but there was no source documentation to support eligibility. **No further action is needed.**

**Finding #2:** It was found that there were a few applications with missing information in the total household member box. This is considered an incomplete application. It was also found on other applications that the total household member box showed a number not matching what was listed on the application for household member names. The errors were recorded on the *SFA-1 Eligibility Certification and Benefit Issuance Error Worksheet*.

**Corrective Action Needed:** Please correct applications that did not list a number in the total household member box by following up with families to clarify. If there were any changes, be sure to check the income guidelines in case there would be a change. **Second**, clarify those applications that listed household members but household members listed did not match what was reported in the household member box. Again, review the application if there was a change in household member size to confirm eligibility status. If any changes occur with meal benefits, please follow correct procedures to make any eligibility changes.

**Finding #3:** It was found that the public release was not sent out in the appropriate time frame.

**Corrective Action Needed:** Please submit a statement of when the public release will be sent out in the future and to whom the SFA plans to send it to.

**Finding #4:** Prior to verification, the required *Confirmation Review* was not completed.

**Corrective Action Needed:** The purpose of the confirmation is to ensure that a correct eligibility determination was made prior to sending out the *We Must Check Your Application letter*. The confirmation review requirements are fully discussed on page 85 of the USDA *Eligibility Manual for School Meals* (EM). For corrective action, please review the confirmation review requirements in the EM and submit a statement of your understanding of the requirements and intent to comply when verification is conducted next school year.

**Finding #5:** The *We Must Check Your Application letter* was not updated.

**Corrective Action Needed:** Please submit a copy of the updated *We Must Check Your Application letter*. A letter template meeting USDA requirements can be accessed at DPI [verification website](#).

**Finding #6:** Income documentation submitted for the application coded A2 for verification purposes shows that the meal benefits should have been changed to reduce from free.

**Corrective Action Needed:** SFA must send an adverse action letter to the household showing a decrease in benefit. Please submit a copy of the adverse action letter sent to household. Complete the column: *Date of Correction* on the above mentioned Error Worksheet and be sure to use the Notes column of the worksheet to document the reason for any changes in status. Please submit worksheet back to reviewer. Be sure to update the benefit issuance list.

**Finding #7:** Based on the submitted income information for another application chosen for verification, the eligibility status of the application coded G needs to be changed from reduced to free.

**Corrective Action Needed:** SFA must send a letter to the household showing an increase in benefit. Please submit a copy of the letter. Complete the column: *Date of Correction* on the above mentioned Error Worksheet and submit back to reviewer. Be sure to update the benefit issuance list and use the *Notes* column to document the reason for any changes in status.

**Finding #8:** It was found at Nature Hill Intermediate that there was a form of overt identification being recognized by *current purchases* on the computer screen. Several suggestions were given by reviewer.

**Corrective Action Needed:** Please submit a statement of how this will be overt identification will be corrected.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to all food service staff for their positive attitudes, willingness to assist with the review process, and for their dedication to providing excellent customer service to students. Your efforts make a difference!

Oconomowoc Area School District offers students a beautiful garden bar full of fruit and vegetable options that add color and variety to student meals. Offering multiple entrees choices is a great way to ensure customer satisfaction while allowing students the ability to serve themselves empowers them to make healthy choices. Keep up the great work!

### Comments/Technical Assistance/Compliance Reminders

Please make sure to review the training webcasts at <http://dpi.wi.gov/school-nutrition/training/webcasts>. There are short webcasts available that provide more information on each meal pattern component and on additional topics such as production records, product formulation statements, and Offer versus Serve (OVS). These quick webcasts are great training tools to share with staff.

Make sure to join us on the second Tuesday of every month at 2:00 p.m. for the *What's New with School Nutrition* webinar. More information can be found at <http://dpi.wi.gov/school-nutrition/training/whats-new>.

Menu planning resources for the School Breakfast Program can be found at <http://dpi.wi.gov/school-nutrition/school-breakfast-program/menu-planning>. Remember that, in addition to daily requirements, there are also weekly requirements. Pay careful attention to meeting the weekly grain requirement. Refer to the breakfast meal pattern table at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-mpt.pdf> for details.

If one of the daily breakfast entrée options only credits as a 1 ounce equivalent (oz eq) grain, and students are not able to select another grain item (or meat/meat alternate item that is crediting toward requirements as a grain) without incurring an additional charge, then the weekly minimum grain offering over the course of the week would add up to only a 5 oz eq, which does not meet requirements.

It is recommended to display the cold breakfast entrée choices in the same location in the service area so that it is easier to identify what students can take as part of a reimbursable meal. The mini pancakes and the bagel observed onsite at Nature Hill Intermediate both credit as a 2 oz eq grain. However, the pop tarts, muffins, cereal bars, and cereal choices all credit as a 1 oz eq grain. Graham crackers are offered as a choice with the cereal. However, you may want to consider offering the graham crackers with the other 1 oz eq grains as well to ensure weekly requirements are met.

If you consider offering doubles of the 1 oz eq grains (i.e., 2 pop tarts, 2 cereal bars, 2 muffins, etc), remember to keep the dietary specifications of the meals in mind. While you may be able to meet dietary specifications with some doubled options, some of the breakfast options will be too high in

calories, saturated fat, and/or sodium to meet dietary specifications when doubled. Cost will also be a factor in determining which items you allow students to take two of. Strong signage is needed to help clarify entrée choices to both students and staff. See **finding #1** below.

Breakfast at Ixonia Elementary was not reviewed as part of the Administrative Review process but resources for Breakfast in the Classroom (BIC) were discussed briefly onsite. To learn more, go to <http://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>. On this page, you will find many BIC resources including a handout, toolkit, and a link to a resource center.

The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined a sodium restriction using three targets to allow for a gradual implementation. The first target was implemented July 1, 2014. The second sodium target will take effect beginning July 1, 2017. We have a number of resources pertaining to sodium posted on the NSLP menu planning webpage at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>. The direct link to a table outlining the restrictions can be found at [http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cnr\\_sodium.pdf](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cnr_sodium.pdf). More information on the second sodium target can also be found in the USDA guidance memo SP 15-2017 at <https://www.fns.usda.gov/sites/default/files/cn/SP%2015-2017os.pdf>. Schools will be offered some flexibility with the target as described in the memo. In preparation for the second sodium target, consider looking into lower sodium options for your canned soups, sauces, and condiments.

Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Each production kitchen needs copies of those recipes to refer to. It is recommended that the district chef routinely review and update the recipes at each site to prevent production issues. See finding #4 below. Instructions for standardizing recipes and recipe templates can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.

It was observed onsite at Nature Hill Intermediate that the sliced carrots offered on the garden bar ran out during service and were replaced with cucumbers and green beans. While this did not affect the daily vegetable requirement for lunch, it may impact weekly vegetable subgroup requirements if the sliced carrots were planned to meet the red/orange vegetable subgroup requirement. When substitutions are needed, it is recommended to substitute vegetables from within the same vegetable subgroup. As discussed onsite, subbing in baby carrots for sliced carrots would have ensured that all students that day had been offered a red/orange vegetable. Consider supplying schools with a list of appropriate substitutions. It may also be helpful to share the vegetable subgroup table at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf> with staff to help them make substitutions within subgroups.

### **Findings and Corrective Action Needed**

**Finding #1:** Signage that helps students understand how to create a reimbursable meal is required for breakfast. As discussed onsite, there are many breakfast entrée options offered to students at

Nature Hill Intermediate but it is unclear to students, staff, and other personnel what students can take as part of the reimbursable meal. Based on the service area at Nature Hill Intermediate, it would likely be easiest to have multiple signs posted along the line that prompt students to make appropriate selections. Alternatively, you can utilize the signage resources at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>. Free posters and other materials can be ordered by completing the order form at [https://docs.google.com/forms/d/1rIGjKHSxkmtYtYsl4GuRIXL3NK3tEoZ-8JT-G9RKbgI/viewform?edit\\_requested=true](https://docs.google.com/forms/d/1rIGjKHSxkmtYtYsl4GuRIXL3NK3tEoZ-8JT-G9RKbgI/viewform?edit_requested=true).

**Corrective Action Needed:** Submit a written statement describing the type(s) of breakfast signage that have been posted at Nature Hill Intermediate.

**Finding #2:** All food items offered as part of a reimbursable meal must be recorded on daily production records. It was observed onsite at Nature Hill Intermediate that there were more breakfast entrée options offered than were recorded on the production records.

**Corrective Action Needed:** Submit one day's completed production record for breakfast that clearly shows that all food items offered with the reimbursable meal have been recorded.

**Finding #3:** It was observed onsite at both Ixonia Elementary and Nature Hill Intermediate that staff would benefit from additional training on OVS. During breakfast at Nature Hill Intermediate, there were questions and uncertainty about components versus items and what students could take as part of a reimbursable meal. At lunch at Ixonia Elementary and Nature Hill Intermediate, it was observed that staff need additional training on fruit and vegetable portion sizes to ensure that students have selected at least ½ cup of fruit, vegetable, or combination in order to create a reimbursable meal. Consider measuring ½ cup portions of common fruits and vegetables on to trays for staff to see what they look like. Taking pictures of the portion sizes can be a powerful tool for future reference. Another option to consider is keeping a quick reference guide by the registers that helps remind staff what appropriate portion sizes look like. Be sure to focus on how items like orange wedges, baby carrots, sliced cucumbers, and leafy greens credit. Consider posting pictures or additional signage about common portion sizes on the garden bar for students to reference.

**Corrective Action Needed:** Submit a written statement detailing the steps that will be taken to train staff on OVS for breakfast and lunch in order to ensure that staff members are able to recognize reimbursable meals.

**Finding #4:** It was observed that Ixonia Elementary did not have a recipe for the Spaghetti and Meatballs entrée option that was served during the review. In place of the recipe, staff weighed the meatballs out to a similar weight as the beef crumbles used in another recipe. However, the meatballs and the beef crumbles credit differently based on weight because of the differences in ingredients. Staff prepared enough meatballs for each student to have three, which credited as a 1 oz eq meat/meat alternate. The recipe that the district chef intended the school to use called for 5 meatballs per student, which credits as a 2 oz eq meat/meat alternate. To help ensure students receive the correct number of meatballs, it is recommended that the meatballs are served separately from the spaghetti rather than combined prior to service. This would also allow students to decline the meatballs if they want to.



**Corrective Action Needed:** Submit a written statement confirming that the Spaghetti and Meatballs recipe has been sent to all schools that prepare that menu option. Confirm in the written statement that staff have been reminded to contact the district chef any time they are missing a recipe.

### 3. RESOURCE MANAGEMENT

#### Comments/Technical Assistance/Compliance Reminder

##### **Meal Counting and Claiming**

Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.

When entering the claim it is necessary to use the edit check (AccuClaim for Skyward) to calculate your reimbursable meals by site for consolidation.

##### **Non-program foods**

Regulations now require schools to run what is called the Non-Program Foods Revenue Tool which will determine if the school is generating sufficient revenue to cover food costs. Information used to run the tool is taken from the Annual Financial Report. This department strongly recommends schools cover food and labor costs for all Ala Carte activities. The USDA tool is located on our website at [http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr\\_tool.xls](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls).

Also as a reminder non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals, Catered Meals, and Food Service operated Vending Machines. All non-program food costs including food, labor, equipment, purchased services, and other expenses must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit. There is a calculator located on our website to aid you in calculating the prices of your non-program foods.

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/nonprogram-food-price-calculator.xlsx>

To document non-program food compliance with the Federal regulation, the USDA Non-program Foods Revenue Tool needs to be completed. To do this, the SFA must select a reference period of at least 5 consecutive operating days (4 consecutive days for schools which only operate 4 days) of a regular school week, and compare the reference period revenue ratio to the food cost ratio to determine if the revenue ratio is equal to or greater than the food cost ratio. Rather than separating all costs for the entire year (although recommended), SFAs must separate their non-program food costs from their program food costs for the selected period to complete the Non-program Foods Revenue Tool. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance.

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

#### **SFAs must collect the following SFA-wide information for the reference period**

For non-program food revenue, the dollar amount of non-program food sales, including a la carte sales, adult meals, vending machines, and any other non-program food purchased with nonprofit

school food service account funds. For total revenue, the dollar amount of program and non-program food sales.

For non-program food cost data, include:

An itemization of all non-program foods to be offered during the reference period;

The per item/serving cost of each non-program food, including food sold only as non-program food, food sold as program and non-program food (crossover food);

The number of servings/items sold.

For total food cost data, include all non-program food cost data and program food cost data. Program food cost data should be readily available using production records, invoices, etc.

**Technical assistance** was provided regarding the non-program foods tool. While the district ran the tool, it appeared that different numbers were used than what should have been used to complete the complete tool. **Technical assistance** was provided to the SFA regarding what numbers to use for the tool.

## **FSMC**

**SFA** must review the claim for reimbursement monthly and sign off on all edit checks before claim submission.

**SFA** is responsible for establishing all prices by running the PLE tool yearly and meeting the non-program foods pricing regulation.

**SFA** needs to pay its own bills and **SFA** needs to reconcile its invoices and check its charges from the FSMC to assure accurate payments and credits. If the FSMC is responsible for collecting all monies for deposit on family accounts these must be deposited in a SFA bank account.

The **SFA** must conduct a reconciliation at least annually to ensure that the FSMC has credited it for the value of all USDA Foods received for use in the SFA's food service in the school year, including the value of USDA Foods contained in processed end products and any rebates, discounts and credits received by the FSMC from processors.

## **Findings and Corrective Action Needed**

**Finding #1:** It was found that the submitted claim for the review month of December did not match with the edit checks.

**Corrective Action Needed:** Please submit a month of breakfast and lunch claims along with the Accuclaim that was used to submit the claims. Please have district representative sign off on them as required.

**Finding #2:** It was found while the non-program revenue tool was run, incorrect numbers were used.

**Corrective Action Needed:** Please use corrected numbers to run the tool and submit a copy.

## 4. GENERAL PROGRAM COMPLIANCE

### Comments/Technical Assistance/Compliance Reminders

Great job running a la carte options through the Alliance for a Healthier Generation's Smart Snacks Product Calculator. Make sure to update the information kept on file any time a product is reformulated or a new product is introduced. As a reminder, products that list "whole corn" as the first ingredient would be run through the calculator tool as a whole grain rich product and not as a vegetable.

❑ **Finding #1:** Two products were observed onsite at Nature Hill Intermediate that did not meet Smart Snacks regulations. The Rold Gold Tiny Twist Pretzels and the Nabisco Chips Ahoy 100 calorie packs were not whole grain rich products.

**Corrective Action Needed:** It was discussed onsite that these products would be moved to the high school, which does not participate in the National School Lunch Program. Submit a written statement verifying that this has been done. If it is decided to not move these products, submit a written statement detailing the timeline for phasing these products out at Nature Hill Intermediate.

### **Special Diets**

SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to a 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>.

School food service staff may make food substitutions, at their discretion, for children for whom they do not have 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. Accommodations made for students without a signed medical statement from a licensed medical practitioner 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.

### **Content of the Wellness Policy**

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

[http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](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 process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>. **Technical assistance** was provided regarding updating the wellness policy.

### **Civil Rights**

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 just updated in October 2015 <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. **Technical assistance** was provided.

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. The form to assist in filing these complaints can be found on the DPI SNT website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>.

### **Food Safety**

School agencies participating in the school nutrition programs agree to maintain necessary facilities for storing, preparing, and serving food and to comply with health standards required by applicable state agency and/or local laws and codes. There are four food safety requirements specified by U.S. Department of Agriculture (USDA) for school agencies that participate in the National School Lunch (NSLP) and/or School Breakfast (SBP) Programs;

- Request two food safety inspections from the state or local governmental agency responsible for food safety inspections each school year for each school participating in the school lunch or breakfast program. Food Safety Inspections in Service-Only Sites Participating in the School Meals Programs - USDA Guidance Memo SP 45-2011 (8/3/11) **Technical assistance** was provided due to only one inspection being done each year at Ixonia Elementary which is located in Jefferson County, WI.
- Publicly post the most recent food safety inspection and make a copy of the inspection report available upon request.
- Implement a food safety program based on Hazardous Analysis Critical Control Point (HACCP) principles, per USDA guidance.
- Report annually the number of food safety inspections conducted at each site to Department of Public Instruction.

Please review the provided link to access food safety information as well as templates regarding food safety plans and the HAACP process 1, 2 and 3 <http://dpi.wi.gov/school-nutrition/food-safety>.

**Technical assistance** was given regarding HAACP process 1, 2 and 3. Additionally, information was provided regarding having an SOP for foods that are satellite to other kitchens. Again this link can provide the required forms or templates needed to assist the SFA <http://dpi.wi.gov/school-nutrition/food-safety>.

### **Professional Standards**

- 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.
- The hiring standards for SFA directors are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>.
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education 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.
- 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 website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>. **Technical assistance** was provided to track training hours district wide for professional standards.

### **School Breakfast (SBP)**

At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year

### **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 small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. 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. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

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 can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

**Technical Assistance Provided:** Noncompliant food items that were observed included canned fruits (i.e. mandarin oranges and fruit cocktail) and produce (i.e. melons, cucumbers and tomatoes).

Recommendations for compliance:

- Add Buy American clause to vendor contracts/solicitation agreements. Monitor products when delivered to ensure they are domestic.
- Some products will not be grown domestically, such as pineapple and mandarin oranges. You will need to check with your vendors to see if these products are available domestically. If they are not, document on the Non-compliant Product List, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>. Other possible reasons for not purchasing domestically includes: cost, seasonality, availability, and substitution.
- If ordering online check with vendor to see if there is a link for determining the origin of the product.

Please ensure that you are compliant with the Buy American provision moving forward. If you have additional questions, please contact Randy Jones or Alex Zitske on the DPI staff about this provision/requirement.

### **Findings and Corrective Action Needed**

**Finding #1:** It was found that the non-discrimination was not the correct one on program letters generated from the software program utilized by the school.

**Corrective Action Needed:** Please submit a statement on how this will be corrected in the software system.

**Finding #2:** It was found that while there was tracking of training being done but there was no SFA wide document to track trainings.

**Corrective Action Needed:** Please submit a document to show how the district will track required trainings for professional standards.

**Finding #3:** It was found that there was no inspection report posted in a visible spot where the public could view it in both schools.

**Corrective Action Needed:** Please submit a statement as to where the health inspections will be posted in Ixonia and Nature Hill.

**Finding #4:** Please submit a HAACP process 1, 2 and 3 form listing food product items in the respective categories. Ixonia did have a sheet but it stated High School on the bottom. In addition reviewer was not sure how current the HAACP 1, 2 and 3 form was. Nature Hill Intermediate did not have a HAACP 1, 2 and 3 sheet with product listings.

**Corrective Action Needed:** Please submit HAACP 1, 2 and 3 form showing product items used and that they are listed in the respective categories for Ixonia and Nature Hill Intermediate.

## 5. OTHER FEDERAL PROGRAMS REVIEWS

### Comments/Technical Assistance/Compliance Reminders

#### **Summer Feeding**

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

---

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. 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 webpage [dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017).

