

# USDA Child Nutrition Programs Administrative Review Summary Report

---

**School Food Authority: Lad Lake, Inc.**

**Agency Code: 67-9143**

**School(s) Reviewed: Lad Lake, Inc. (Dousman campus)**

**Review Date(s): Monday, April 10 – Wednesday, April 12, 2017**

**Date of Exit Conference: April 12, 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).

### **Notes:**

- This SFA is a Residential Child Care Institution (RCCI) and is non-pricing for all students.
- Their residential students are claimed as Free and Passage Day students as Paid, but will begin matching those day students through Direct Certification and the ones who qualify to be claimed as Free, also. A daily census sheet is completed at each claimed meal.
- Per USDA memo SP 27-2008, "Mandatory Implementation of Direct Certification with the Food Stamp Program", dated July 1, 2008, all RCCIs and boarding schools must conduct direct certification for any day students in attendance. Specific information may be found in the most current Eligibility Manual for School Meals as found here: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-2016.pdf> or the

DPI webpage dedicated to Direct Certification (DC): <https://dpi.wi.gov/school-nutrition/direct-certification>.

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

Thank you to the staff at Lad Lake, Inc. for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The files were organized and complete which reduced the time spent with team members onsite. Thank you for all who took time to discuss the programs and areas of review and accepted technical assistance in different areas.

The facility is organized and attractive for students participating in the meal programs. The staff is trained and competent to complete their food service duties. Some staff members have attended DPI trainings like Annual Financial Report and Financial Basics.

The staff greet students and staff members to offer meals and kindness through several lunch periods. The students seem respectful of the staff. The school nutrition team is aware of the unique regulations for an RCCI.

A special thank you to so many other staff members who assisted in areas of this Administrative Review. It was a pleasure to meet you and offer technical assistance.

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Commendations**

- School Breakfast and National School Lunch meals are being offered to all residential students each school day. The day students, called Passage Day School students, are offered just lunch each school day.
- The meal counting and claim was conducted correctly.
- Thank you for your attention in the Direct Certification process.

#### **Comments/Technical Assistance/Compliance Reminders**

##### **Certification and Benefit Issuance**

- At the time of review, all participants were non-pricing and claims were entered based on free for residential students and paid for the Passage Day School students. Moving forward, this Local Education Agency (LEA) will be required to complete the process for benefit issuance for meal benefits for its Passage Day School students instead of claiming them all in the paid category.
- If this LEA chooses to also send free and reduced price meal applications, there will be several items of technical assistance that may apply. It would be helpful, then, to attend the 8 hour training on Free/Reduced Meal Benefits and the Verification Process.

### Direct Certification

- Direct Certification is required for only the Passage Day School students. As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- It is useful to run the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

### Other Source Categorical

- If a Passage Day student is known to be Other Source Categorical Eligibility, such as homeless, migrant, or runaway, through knowledge at the SFA, the appropriate program official can indicate to the determining official that free meal benefits can be provided to those students. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- A foster child is 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.

### Limited English Proficiency (LEP)

- 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.
- LEAs must make reasonable efforts to provide household letters to families in the appropriate languages. DPI has the English letters translated into Spanish and Hmong.
- The nonprofit food service account may be used to pay for translation services for food service purposes if there is a need to translate materials in a language that is not currently available.

### Transferring Students

- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. The transfer of eligibility between LEAs for students attending Community Eligibility Provision (CEP) schools will be required by July 1, 2019.

### **Verification**

- The Verification Collection Report is to be completed and entered by February 1 each year. This process will change some with the start of DC matches. Please contact the DPI SNT for more information and instruction.

### **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.
- A process of meal counting will be required to determine which meals served are for the Passage Day School students identified under Direct Certification for free meal claiming; the rest of the meals will be paid meal claiming.

- When entering the claim, it is necessary to use the edit check to calculate your reimbursable meals by site for consolidation.
- Meals must be offered to all students each day school is in session a full day, so DPI has posted a Field Trip resource page on our website to help schools offer a meal to students found under NSLP, then meal planning. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/field-trip-meals-templates.doc>
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

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

- ❑ **Finding #1:** The process for certification and meal benefits issuance must be completed with Direct Certification (DC) matches to the State database. Direct Certification promotes participation in School Meals Programs by simplifying access to free meals for foster children and students in households with lower incomes. DC electronically matches your student file to a state database of children in families enrolled in FoodShare, W-2 cash benefits or the foster care system. Each School Food Authority (SFA) is able to run DC as often as it wants.

**Corrective Action Needed:** Please develop a process to implement the Direct Certification process and submit the timeline and plan to the consultant. After training and discussion with new meal eligibility officials on 4/12/17, indicating they will begin the process by the beginning of May 2017, this item is considered COMPLETED.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations**

Sincere thanks to the Food Service Director, nutrition professionals, and staff of Lad Lake. We appreciate your time and effort spent preparing for and participating in the onsite review. Thank you also for your receptiveness to feedback, both positive and constructive criticism. Open communication helped identify strengths, such as cycle menus, and areas of opportunity, such as procurement, for the food service at Lad Lake. Everyone we encountered was welcoming, friendly, and helpful. Students enjoyed hot entrees and a variety of colorful fruits and vegetables to choose from.

### **Comments/Technical Assistance/Compliance Reminders**

#### **Production Records**

Production records are intended to be useful tools to record information prior to production, during production, and following production. All sections of the production record must be filled in completely each day. Date, preparation site, meals planned, and meals served were frequently left blank. Daily production records show portion sizes of meal components were appropriately planned and served. Please continue to work with all staff members to record planned usage, actual usage, and leftovers.

The breakfast and lunch production record templates currently in use are missing required information. While there is no required template, there are examples on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>.

The current templates must be updated to include the following required information for continued use:

- Menu type (lunch, breakfast)
- Menu item with recipe name/reference number or product name/description
- Planned number of portions
- Milk types available and actual usage by type

Additionally, the columns “Amount Prepared” and “Amount Leftover” must be altered so the following required information can be distinguished:

- Total number of purchase units prepared
- Total number of portions prepared and number of portions left over

Be specific about the identity, brand, and description of the items served. Instead of “fruit choice canned” or “whole grain cereal”, list the specific type. Those descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records.

### **Crediting Documentation**

Processed products require a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number, weights of raw and cooked ingredients, portion size, statement of contribution to meal pattern requirements, and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead, and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson.) If a processed item does not have a valid CN label or PFS, it may not be credited when served as part of the USDA’s Child Nutrition Programs. Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

Remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year. More information regarding crediting documentation can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>.

### **Milk Types**

The only allowable milk types to serve in Child Nutrition Programs are non-fat (skim) unflavored milk, non-fat flavored milk (e.g. chocolate, strawberry), and 1% unflavored milk. Neither 1% flavored nor 2% (flavored or unflavored) milk can be served. Please discontinue serving low-fat chocolate milk. As a reminder, at least two choices of allowable milk types must be offered daily at each meal.

### **Portion Control Tools**

A portion control tool is a serving utensil that measures the amount of food. Examples of tools that portion include scoops or dishers and spoodles. Use scoops and spoodles to serve fruits, mashed potatoes, rice and so on. They measure different serving sizes and are numbered to differentiate the sizes such as #8 (1/2 cup), #16 (1/4 cup) etc. Essentially, a measuring cup on a stick. Slotted, pierced, or perforated spoodles are important for serving foods prepared in liquid that you do not want to add to the portion. Examples are green beans, corn, peas. An important aspect of portion control is using the tools correctly. The correct way to portion food is to use a level scoop, which means that the item is served as planned. When the scoop is heaping, it provides excess calories and nutrients, it increases the food cost because you will require more food to serve the same number of students, and it can lead to food shortages. Conversely, a scant scoop may not meet meal pattern requirement and lead to

increased waste. If it does not measure, it is not a portion tool. Examples are tongs, turners, and spoons. Remember, a pinch or a handful is not a measurement.

### **Corrective Action**

**Meal Pattern Finding #1:** Insufficient crediting documentation for Fontanini meatballs, Tony's cheese pizza, Chef-mate country gravy, Farmland sausage patty, chicken patty (for Chicken Biscuit Breakfast Sandwich), biscuits, pancake on a stick, and 2 oz slider The Cloud burgers from Rochester Meat Company.

**Required Corrective Action#1:** Please submit current Child Nutrition (CN) labels or product formulation statements for the items listed above.

**Meal Pattern Finding #2:** Due to a significant amount of missing information, requested above, I was unable to complete a review of compliance with weekly component requirements for breakfast and lunch.

**Required Corrective Action #2:** Please submit all of the corrective action requested above. Note that the menu will be reviewed for compliance with component quantity requirements once all necessary documentation is obtained. If the menu does not meet all weekly requirements at that time, further corrective action may be required.

**Meal Pattern Finding #3:** Minimum daily requirements for vegetables were not met during the week of review, with a 1/8 cup shortage on Friday, March 10. Hash brown patties weigh two ounces each per the manufacturer, and a serving of two tri-taters credits as 3/8 cup based on the Food Buying Guide.

**Required Corrective Action #3:** Please submit a statement describing how you will meet the minimum daily requirements going forward.

## **3. RESOURCE MANAGEMENT**

### **Commendations**

- This SFA is non-pricing so they are not required to have the Unpaid Meal Charge Policy or complete the Paid Lunch Equity (PLE) tool.
- Nonprogram foods revenue, catering, vending, etc. are areas not administered by this school nutrition program.

### **Comments/Technical Assistance/Compliance Reminders**

#### **Nonprofit School Food Service Account**

- The SFA's Child Nutrition program report provides a compilation of meals claimed, the reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch, breakfast or other programs. The Aids Register tracks all program deposits made to the SFA's account and the amount deducted from the reimbursement to pay for shipping, handling and processing costs of USDA Foods. These may be found on our Online Services webpage: <http://dpi.wi.gov/nutrition/online-services>.
- Since this is RCCI has expenses larger than revenues received, money needs to be transferred from non-Federal sources into the food service fund to bring the balance to \$0.00, as the food service fund may not end in a negative balance.

### Annual Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- When tracking revenues and expenditures, please keep in mind:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
  - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
  - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “A la Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
  - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

### Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel. The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- 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>. If line items like garbage disposal are charged to food service, it must be calculated in a direct fashion, like counting the number of garbage bags for food service versus the other departments on school grounds,

### **Revenue from Non-program Foods**

- **Non-program Foods Revenue Rule SP-20-2016**  
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
  - Non-program Foods “In a Nutshell” <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
  - Non-program food revenue for this SFA only includes Adult Meals. The Adult Meals expenses and revenues will be separated out in the Annual Financial Report for school year ending June 30, 2017. A transfer of funds may need to occur based on the financial findings, as is typical in RCCIs. There needs to be a
  - All non-program food costs including food, labor, equipment, purchased services, and other must be covered by revenues or a transfer of funds. 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.

- Non-program Food costs and revenues must be separated from Program Food costs and revenues.
- Adult meals are considered non-program foods. Either the SFA must charge for Adult meals appropriately per this *Wisconsin Adult Meal Pricing Worksheet* <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc> or show a transfer of non-Federal funds to the food service fund to cover any excess expenses over revenues in this category. If your SFA decides to charge an adult less than the required price as stated on the annual online contract, the SFA must transfer money to cover that value.

### **Indirect Costs**

- DPI does not allow the annual assigned indirect cost rate to be applied to the foodservice account. 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 on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. 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 - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
  - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
  - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

## **4. GENERAL PROGRAM COMPLIANCE**

### **Commendations**

- Civil rights training had been attended by most of the intended staff with documentation available for review.
- The Civil Rights Self-Evaluation Compliance form (PI-1441) was completed and included in the file documents.
- Thank you for completing the Onsite Monitoring of the Child Nutrition programs at Lad Lake, Inc. Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1. The Onsite Monitoring was completed for Breakfast and Lunch, but not the Readily Observable General Areas. Please



complete that section next year, as well. The forms may be found here:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-onsite-monitoring.doc> and <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc>.

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked. The current food service director was hired before the rule date and is compliant.
- Many annual trainings are taking place and documented in a system-wide tracking process. Please include all staff for all trainings which qualify for Professional Standards approval.
- This site's Food Safety Plan is comprehensive and includes all process 1, 2, and 3 items, all standard operating procedures (SOP) for the site, all equipment, and food service staff and is reviewed yearly. Updated prototype food safety plan templates and SOPs may be found at our website under <http://dpi.wi.gov/school-nutrition/food-safety>. The binder includes an older version, which is reviewed annually, but it was suggested to update to the newer template on the DPI website: [https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp\\_may14\\_1.doc](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp_may14_1.doc).
- The Food Safety Plan was available for review and being implemented in the kitchen. Hairnets, gloves and aprons are being worn, as well as temperatures taken for refrigeration equipment and food items.
- The Local Wellness Policy (LWP) was reviewed and suggestions were offered for revisions to be compliant with the current regulation.
- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner. All school nutrition documents must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.
- Food safety inspection reports and the "And Justice For All" posters are posted in public view.

### **Comments/Technical Assistance/Compliance Reminders:**

#### **Civil Rights**

##### Nondiscrimination Statement

- When including the nondiscrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. However, when space is very limited, such as on printed menus, only this abbreviated statement may be used, "**This institution is an equal opportunity provider,**" so that it can be printed in the same size font as the other printing in the document.

##### 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. You may use the prototype Medical Statement for Special Dietary Needs

posted on our website which is also available in Spanish and Hmong: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.

- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow's milk and pre-approved through DPI. Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use. See SP 07-2010 for more information: [https://www.fns.usda.gov/sites/default/files/SP\\_07\\_CACFP\\_04\\_SFSP\\_05-2010\\_os.pdf](https://www.fns.usda.gov/sites/default/files/SP_07_CACFP_04_SFSP_05-2010_os.pdf).

#### Processes for complaints

- All SFAs should have procedures (written procedures preferred) for receiving and processing any complaints alleging discrimination within the National School Lunch Program and School Breakfast Program. An 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 [https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.

#### **Local Wellness Policy Summary for Administrative Review**

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 of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 with full compliance of the requirements 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 each school complies with the policy.

#### 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 the process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment results 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://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/LWP%20Summary%20-%20Final%20Rule.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>.

### Professional Standards

- 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>.
- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

<b>Directors</b>	<b>Managers</b>	<b>Full-time Staff</b> (20 hrs or more/week)	<b>Part Time Staff</b> (less than 20 hrs/week)
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
<b>8 hours</b>	<b>6 hours</b>	<b>4 hours</b>	<b>4 hours</b>
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
<b>12 hours</b>	<b>10 hours</b>	<b>6 hours</b>	<b>4 hours</b>

- Staff training for kitchen personnel may include any food safety topics, Offer vs. Serve, School Breakfast Program, Menu Planning and Meal Pattern, as found on our training webpage <https://dpi.wi.gov/school-nutrition/training>. The individuals who need specific training may find topics like the Annual Financial Report, Meal Claims, Direct Certification and Verification Collection Report, also on that webpage.

- Food show attendance may only credit one hour of continuing education per year.

## **Food Safety, Storage and Buy American**

### Temperatures

- All pieces of cooling equipment must have the internal temperature taken and recorded daily on a temperature log. Please include a thermometer and temperature log for the milk cooler on the serving line.

### Food Safety Plans

- SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria, as applicable.
- The USDA FNS Office of Food Safety is excited to share a new educational resource for school nutrition professionals. *A Flash of Food Safety* is an educational video series designed to help busy school nutrition professionals understand and practically apply safe food practices. The videos, available in English and Spanish, address five food safety topics: *Handwashing: Why to Wash Your Hands*, *Handwashing: How to Wash Your Hands*, *Calibrating a Thermometer: Ice Water Method*, *Calibrating a Thermometer: Boiling Water Method*, and *Active Cooling with a Chill Stick*.

Each “flash” video is 2-4 minutes long and can be accessed online via YouTube. They are easy to view from a desktop, laptop, tablet or smart phone – perfect for onsite training! Individuals can earn 15 minutes (1/4 hour) of continuing education for [Professional Standards](#) when they watch all five videos in the series. A certificate of completion is available through the USDA FNS Office of Food Safety website. To view *A Flash of Food Safety*, please visit [www.fns.usda.gov/ofs/food-safety-flashes](http://www.fns.usda.gov/ofs/food-safety-flashes)

### Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).

### Time as Public Health Control

- When using “Time as a Public Health (Temperature) Control”:
  - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
  - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
  - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees F., or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration

during service, including TCS foods on garden bars, all leftover TCS foods must be discarded.

Must be kept above 135 on hot line with mechanical heat	Must be kept under 41 degrees with mechanical refrigeration
Animal protein – eggs, meat, chicken, fish, shellfish, etc.	Milk and cheese, including house made dressing made with milk
Tofu and soy products –texturized vegetable protein, hot edamame	Hard boiled eggs
Baked potatoes	Tofu, edamame, soy
Heat-treated plant food, such as cooked rice, beans, vegetables	Sliced melons, cut leafy greens, cut tomatoes
Anything with cheese	Untreated garlic-and-oil mixtures
	Sprouts

### Buy American

- The USDA requires that a 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 <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>. Please complete this non-compliant document for any items which are not a “Product of the USA”, like canned mandarin oranges and pineapple or fresh produce at certain times of the year.

Three non-domestic products were identified – canned mandarin oranges from China, canned pineapple and Dole Mixed Fruit from Thailand. Non-domestic products must be documented, including the reason for exception to the Buy American provision.

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

- Finding #2:** Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. This is the link to the

prepared training on the DPI website: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>.

**Corrective Action Needed:** Please include one of the kitchen staff and an office person associated with student meal status to obtain the required annual training. Please submit a copy of the attendance log [https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cr\\_trn\\_log.doc](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cr_trn_log.doc) with the date completed.

- ❑ **Finding #3:** All food service employees must have a signed Employee Reporting Agreement on file. Please include in your Food Safety documents an annual confirmation of employees signing the Employee Health Reporting Agreement <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/employee-reporting-agreement.pdf>

**Corrective Action Needed:** Submit a copy of the signed agreement and a statement of when that annual requirement will be completed in the future.

---

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).

