

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

School Food Authority: New London School District

Agency Code: 68-3955

School(s) Reviewed: New London Middle School and Readfield Elementary

Review Date(s): November 12-15, 2018

Date of Exit Conference: 11/15/2018

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 New London School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. We especially

appreciate the time for questions on the meal observation days at Readfield Elementary and Middle School. 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 New London School District for their efforts to understand and to make changes to meet school nutrition program regulations. It is apparent that the Taher school nutrition staff works well with the school district areas and are part of the school community. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service options, local wellness and customer service. We were impressed during meal service that students had food options, even at the elementary level, and were treated with respect by all staff. The signage in the cafeteria area was pleasant and encouraged a variety of foods on the student tray.

The DPI review team is confident that New London 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

- Three hundred-eighty eligibility determinations were reviewed, with zero errors identified.
- Great work understanding how to use Skyward software system to process and update student meal eligibilities.
- There seems to be effective communication with district households.

Free and Reduced Price Meal 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.
- All free/reduced applications and the direct certification runs were available for review.
- (TA) When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should be kept in the lowest frequency possible. Skyward was correct and consistent in this task. The applications which were determined manually had some inconsistencies in this task. Do not convert to monthly or annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1819.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-1819.pdf>).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

- The 30 operating day carryover period is administered correctly by the student data specialist.
- Notification letters to households for direct certification, application approval or denial and letters in the verification process had inconsistent nondiscrimination statements listed on the template. The templates were updated with the correct statement.
- If a family declines the meal benefits, the LEA receives the request in writing and keeps it on file.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically. The student data specialist checks Skyward to see that the annual software updates also update the income levels each year after July 1.
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-app-parent-letter-faq-1819.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-app-parent-letter-faq-1819.docx).

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete. Good job having these entered correctly.

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 with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus 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.

Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters for required information and correcting the nondiscrimination statement on all letter templates.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, runaway or Head Start, 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.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.
- New London School District has not needed this process as applications were entered into Skyward or processed in a timely fashion.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

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.
- Thank you for making reasonable efforts to provide household letters and application forms to families in the appropriate languages, even a language not supported with DPI materials.
- 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, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](#) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Direct Certification

- (TA) 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. It is helpful to run DC before the end of September and establishing the number of applications on file as of October 1, and also by the end of March for CEP reporting.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running 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.

Transferring Students

- When a child transfers to a new school, transferring the eligibility determination between Local Educational Agency (LEA) ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and may reduce unpaid meal charges to the household. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires "source documentation" of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Disclosure

- (TA) 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. In conversation, it was determined that parents may self-disclose their eligibility status to receive certain fee waivers or benefits offered.
- (TA) 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](#) 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>). Access to this information should not be open to all offices or program directors.
- 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](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Verification

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

- This LEA utilizes a great and thorough verification process, including using the verification tracker form.
- (TA) When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.

- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- (TA) For the verification process to be complete, all sources of income listed on the original application must have documentation supplied. If that is not completely provided, the household will lose meal eligibility after a 10 day Adverse Action notice.

Meal Counting and Claiming

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

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- (TA) When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- (TA) The meal counting and claim for the Review Month was conducted by the bookkeeper. There is an issue with the average daily attendance for one of the sites with low enrollment numbers and high participation numbers. **This discrepancy was corrected onsite.** The bookkeeper consults with the DPI accountant at claim time, as needed.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- 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.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Thank you to all staff at New London School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director for sending all documentation ahead of the onsite visit in a timely manner as this greatly expedited the AR. The responsiveness of the Food Service Director and willingness to make changes onsite was appreciated.

New London does a nice job offering multiple menu options for the elementary and middle school students including various entrees and fresh fruit and vegetables offerings. Staff at the middle school are well trained in Offer versus Serve (OVS) and do a nice job helping students select reimbursable meals. They exemplify customer service by quartering oranges, which makes selecting and consuming fruits easy for students. Staff work well together to prepare and serve food and have a great rapport with students.

New London participates in farm to school initiatives by displaying Harvest of the Month posters with fun facts on sweet potatoes and Rosemary. They are also considering adding a hydroponics system to the food service operation, which can grow lettuce and herbs using year-round, soilless technology. New London Middle School also offered local apples on the day of the onsite visit. Great job promoting farm to school and thank you for serving healthy, nutritious meals to the students of New London!

Technical Assistance and Program Requirement Reminders

OVS and French Fries

Some staff at Readfield Elementary were unclear about what was offered as part of a reimbursable meal. Students were instructed that there were potatoes on the line, but that they could only select one more thing from the salad bar. Technical assistance was provided immediately on discontinuing this practice. Based on the planned menu, students may not be limited to one thing from the salad bar; they could have all vegetable and fruit options available, if desired. It is important that staff understand the OVS requirements and what is offered as part of a reimbursable meal. It is also important that personal preferences do not interfere with or influence what students can select as part of a reimbursable meal.

Fruit, Bananas

At Readfield Elementary, the fruit choice for the day was one banana (½ cup). These were cut in half prior to service to assist young students with opening the bananas. Although this is nice customer service, it was unclear if students were aware they could select two halves to make ½ cup fruit. Most came through the line only selecting one half. To make sure students select a full ½ cup fruit, consider adding signage stating “can select two halves” or leaving the bananas whole.

Standardized Recipes

Any menu item that is made in-house with more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. At breakfast, the toast was buttered before service. Technically, this contains two ingredients (bread and butter) and requires a standardized recipe.

Signage

Although there is ample signage around the cafeteria and serving area at New London Middle School, some have outdated verbiage. Signage refers to the food groups as, “protein, bread, and milk.” In the NSLP and SBP the food components are referred to as meat/meat alternate, grain, and milk. Consider updating signage to reflect the new language.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

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

- The consultant addressed financial topics with the Business Manager. He has great knowledge and command of the food service entries.
- This SFA has limited the net cash resources in order to not exceed three months average expenditures.
- The SFA had a positive balance as of January 31, 2018 which waived the Paid Lunch Equity tool requirement.

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program. The [Annual](#)

[Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - 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” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “nonprogram foods”, report 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, a la carte, paid milk in the Wisconsin School Day Milk Program and caterings would also be included here.
 - When revenues are recorded from the federal reimbursement payments, 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 an NSLP food expenditure for private schools and a purchased service for public schools.

FSMC

- The invoices from Taher break down costs for the business manager to have knowledge of the school nutrition program is operating. A more detailed invoice indicating “non-program food” may be necessary for proper coding to transfer to the AFR.

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.
- 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 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. New London School District has a new meal charge policy 761 that covers all areas and is communicated to families through the annual handbook.

Revenue from Nonprogram Foods

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

- (TA) 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), and any Catered events.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xls>).

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

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- The SFA needed to increase the adult lunch price. **It was corrected onsite 11-14-18.**
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2018-19 SY) should be used to determine adult prices.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<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>)

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, rent, printing and mailing services, 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 - 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 the district’s total.

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.**” Either of these statements must be in the same size font as the other text in the document.
- (TA) The notification letters to parents are generated from the Skyward system; some did not have the updated statement. **All letter templates were corrected onsite.**

And Justice for All Poster

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

Civil Rights Training

- (TA) Civil rights training is conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. Include confirming official, any office staff and teachers applicable.
- Thank you for the documentation from the back-to-school training.

Civil Rights Self-Compliance Form

- (TA) The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and

Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)

- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- (TA) Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Processes for complaints

- All verbal or written civil rights complaints alleging discrimination within the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or the State Agency (DPI School Nutrition Team) within 5 days, per FNS Instruction 113-1 (Section XVII Section C, paragraph 2). You will want to make sure that this is included in the district procedures to ensure compliance.
- Additionally, per FNS Instruction 113-1, if an individual makes allegations of discrimination *orally* and “is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements” of the allegation for said individual. (Note: The items which should be included in the write up are listed in FNS Instruction 113-1.) Such complaints should then be forwarded to the State or Regional office, as appropriate, within the established timeframes.
- 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. 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. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

On-site Monitoring

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

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the School Breakfast Program (SBP) administered by the SFA; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our Administrative Review webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

Food Service Management Company (FSMC)

The following duties may not be delegated to the FSMC:

- Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year. It is due February 1 annually and the documents are kept onsite. The FSMC school nutrition director may accompany the school district employee on the onsite reviews.
- Signature Authority – a representative of the SFA must sign off on the contracts for the SFA
- Edit Checks- an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software.

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.
- Policy 458 covers all Local Wellness Policy requirements and is being followed by school staff.

Smart Snacks in Schools

Technical Assistance and Program Requirement Reminders

Cookies at Breakfast

Cookies are unallowable grains at breakfast. However, if they are sold a la carte and meet smart snack requirements, they are allowable. Serving a la carte cookies at breakfast is not best practice as students should not be viewing cookies as an appropriate grain option. The Food Service Director was very responsive to this feedback and immediately took the cookies off the line as an a la carte option.

Marketing and Advertising

Food products and brand names that do not meet the Smart Snack standards should not be marketed or advertised in the cafeteria or service area. Currently, there is a Coca-Cola cooler in the service area with advertising on the sides. Caffeinated beverages are unallowable at the middle school level. Consider covering the cooler to prevent students from viewing this advertising.

Fundraiser Tracking

One requirement for school fundraisers is documentation. Keeping records of school fundraisers, both compliant (meets Smart Snack standards) and non-compliant (does not meet Smart Snack standards), using DPI-provided tracking tools is a great way to make sure schools are meeting Smart Snacks regulations. Although New London Middle School does catalog-based fundraisers, these should be tracked. If using a different tracking tool, make sure to record the following:

- Specific location and time of day for each fundraiser
- Student organization holding fundraiser
- Product(s) being sold
- Dates the fundraiser is held

Professional Standards

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

- 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.
- 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.
- Each school nutrition Taher employee attends the back-to-school meeting and required school trainings for their full amount of training hours entered on the tracker tool.

Professional Standards: Training Requirements

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

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Water

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

- Water is required to be available at no charge to students during the lunch and breakfast meal services.
- There were water fountains in the hallway near the cafeteria at each school and cups available.

Food Safety and Storage

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

- The school nutrition director provides food safety training at the back-to-school training and during monthly safety meetings.
- Each site followed great practices of documenting temperatures for food, cooling equipment, and dish washing equipment.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.
- Food safety inspection reports were posted in public view.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service staff 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.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)

Food Employee Reporting Agreements

- All food service employees have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document.

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)).
- The on-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.

Time as Public Health Control

- An SOP for "Time as a Public Health Control" was included in the food safety plan and followed by employees.

- TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Buy American

Technical Assistance and Program Requirement Reminders

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

Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed by, manufactured by, or packed in, the U.S, but the country of origin is not listed, this product requires additional information from the distributor on where the product is originally from.

More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

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.
- All free and reduced price applications, including applications from households denied benefits 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.

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

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

- 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 as an effort to increase participation.
- Breakfast is advertised in the monthly menu and newsletter plus signage at schools.

Breakfast Promotion

- (TA) The breakfast participation in the New London School District is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).
- A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).
- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).
- 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>)
- National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.
- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- (TA) Continue to promote participation in the School Breakfast Program, especially at the schools which qualify for Severe Need Breakfast with an additional reimbursement for meals served to free and reduced-price eligible students.

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. New London School District operated the Summer Food Service Program.
- New London advertises the summer meals and provides notices to local families, including ideas from the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

5. OTHER FEDERAL AND STATE PROGRAMS REVIEWS

Afterschool Snacks

Commendations/Comments/Technical Assistance/Compliance Reminders

- Each site participating in the Afterschool Snack Program needs to have an onsite monitoring review completed within the first four weeks of operation, and a second review within the school year. Thank you for completing those and keeping them in the file.
- Each afterschool snack location is required to maintain documentation which support reimbursable meals were provided to students, including production records with snack items and serving size. Thank you for using the production record to document the number of snacks.
- Participating students are claimed by eligibility category (free, reduced, or paid) when a reimbursable snack is selected. Lincoln Elementary is an area-eligible site and claims all snacks at the free

reimbursement rate. The snack price is wrapped into the cost of afterschool care at different price levels depending on meal eligibility.

- Afterschool sites must provide educational or enrichment activities in an organized, structured, and supervised environment. There is a homework club and other activities for students.
- [Snack Count Sheets](#) and [production record templates](#) are located on the Afterschool Snack webpage (<http://dpi.wi.gov/school-nutrition/after-school>).

Wisconsin School Day Milk Program (WSDMP)

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

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in Pre-K-5th grade. All other students, in the paid eligibility category, may not have the milk claimed. Those milks are counted as non-program foods.
- (TA) Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one. Check the process with teachers and office staff at each elementary school.
- Per the Agreement for the WSDMP in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. The milk at New London is Wisconsin-produced and from Dean Foods.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Findings and Corrective Action Needed: Verification

X Finding #1: The verification was begun for a family that then provided some, but not all of the income sources documentation. They were noted as completed and status did not change. The family has since moved out of state and is not anticipating return to this school.

Corrective Action Needed: Send a copy of the household Adverse Action letter and change the Skyward point of service to “paid” for this child. The child is now “inactive.” **Corrected onsite 11-13-18.**

- Finding #2:** The confirming official must check the information on the applications selected for verification, then sign the back of the application or verification tracker form. Resources about the verification process may be viewed for training hours and more insight. They may be found on this [verification webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>). This is an [informative webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#verif) (<https://dpi.wi.gov/school-nutrition/training/webcasts#verif>).

Corrective Action Needed: Submit a statement of the process to use in the future verification process, including documenting watching the webcast.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Corrective Action

X Finding #3: Starchy vegetables were offered during the week of review at breakfast as part of a reimbursable meal without offering two cups of non-starchy vegetables throughout the week. The following was offered during the week of review:

- Monday: broccoli (1/2 cup **non-starchy**)
- Tuesday: kidney beans (1/2 cup **non-starchy**)
- Wednesday: peas (1/2 cup starchy)
- Thursday: cucumber (1/2 cup **non-starchy**)
- Friday: jicama (1/2 cup starchy)
 - Total starchy: 1 cup; **Total non-starchy: 1 ½ cup** (need at least 2 cups)

If you would like to substitute a starchy vegetable for fruit, at least two cups of non-starchy vegetables from dark-green, red/orange, beans and peas (legumes), or other vegetable subgroup must be planned sometime during the week in addition to the starchy vegetable.

Corrective Action Required: State what will be done to the week of review so that at least two cups of non-starchy vegetables are offered. Include the specific vegetables, their quantities, and on what days of the week they will be offered. **The Food Service Director will serve a starchy vegetable in ½ cup increment one time per week. The fourth day will serve a non-starchy vegetable of celery (½ cup). No further action required.**

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- Finding #4:** The school year 2017-18 Annual Financial Report (AFR) must be revised for proper coding of Wisconsin School Day Milk Program and Non-Program Foods revenues and expenditures.
Corrective Action Needed: Submit a statement when the AFR is revised and submitted; it must be entered by December 28, 2018.
- Finding #5:** One requirement of Food Service Management Companies (FSMC) is to consult a student advisory committee to develop and evaluate menu items.
Corrective Action Needed: Submit a statement of the plan to consult a student advisory committee to discuss menu options and meal service with the FSMC.

4. GENERAL PROGRAM COMPLIANCE

Findings and Corrective Action Needed: Onsite Monitoring

- Finding #6:** The 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 School Breakfast Program (SBP) administered by the SFA. The two reviewed school sites have been completed for NSLP, but not for SBP. The onsite monitoring forms may be found on our Administrative Review webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

Corrective Action Required: Submit a statement with a timeline to complete the NSLP and three SBP onsite monitoring. Submit a completed SBP onsite monitoring form for Readfield Elementary and New London Middle School.

Findings and Corrective Action Needed: Smart Snacks in Schools

X Finding #7: The Tum-e Yummies flavored waters are not allowable at the middle school level. Only plain water, 100% juice, or milk are allowable smart snack beverages in middle schools.

Corrective Action Required: State what will be done with this product to comply with the Smart Snack regulations. **The Food Service Director stated they will stop selling this product immediately. No further action required.**

X Finding #8: The Starburst Strawberry Sorbet 2.6 fl. oz. bars are not smart snack compliant. A product must meet one of the general standards: be whole grain rich, have a fruit, vegetable, dairy product, or protein food as the first ingredient, or be a combination food with at least ¼ cup fruit and/or vegetable. The ingredient list includes the following in this order: water, sugar, skim milk. This does not meet one of the general standards.

Corrective Action Required: State what will be done with this product to comply with the Smart Snack regulations. **The Food Service Director stated they will stop selling this product immediately. No further action required.**

Findings and Corrective Action: Professional Standards

Finding #9: Training hours must be completed and entered on a tracking tool for staff outside of school nutrition to include the business manager/confirming official, student data specialist, bookkeeper, teachers who assist in meal selection for students, and translators for family assistance. This is a sample [training tracker form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>).

Corrective Action Needed: Submit a statement of how these training hours will be completed and tracked.

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snacks

Findings and Corrective Action Needed

Finding #10: Students were being claimed for reimbursement, even if only one component was taken. **Corrective Action Required:** Fiscal Action will be assessed for all non-reimbursable snacks for September and October 2018. Submit the Afterschool Snack Program claim counts for Readfield Elementary School for November 2018, as corrected along with the production record showing the number of snack items used. Include a statement of how to provide a second item for the child with documented special dietary needs.

Findings and Corrective Action: Wisconsin School Day Milk Program (WSDMP)

- ❑ **Finding #11:** In order to maintain an accurate counting and claiming system, each classroom that serves milk for the WSDMP must document daily which students received a half pint of milk and **the count must be taken at the time the milk is served to the student**. It is important that the person completing the entry in Skyward, records which students took a milk. Attendance or a “back-out system” where the students who did not take a milk are recorded and all other students are claimed, is also not an acceptable counting and claiming system.

Corrective Action Required: Submit a statement of how the process will be followed moving forward to provide accurate counts for claiming.

- ❑ **Finding #12:** The WSDMP claim for school year 2017-18 included 829 milks served to the Early Childhood students at a free rate. There was not documentation that shows they are eligible for free milk, so those milks must not be claimed.

Corrective Action Needed: Modify and resubmit the WSDMP claim for 06/01/2018 and alert the consultant when that is complete. Submit a statement of how the Early Childhood milks will be counted and claimed for the current school year 2018-19 and 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. 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 student success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



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