

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

School Food Authority: Tri-County Area
School District

Agency Code: 694375

Review Date(s): 3/13–3/14/18

School(s) Reviewed: Tri-County High School

Date of Exit Conference: 3/14/18

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, 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 Tri-County Area School District for the courtesies extended during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet school nutrition program regulations. Thank you to each staff member that took the time to discuss aspects of the review in great detail and with a positive attitude.

The SFA offers a variety of programs to meet the needs of the student body including NSLP, SBP, Afterschool Snack, Fresh Fruit and Vegetable Program, Wisconsin School Day Milk Program, and Summer Food Service. The food service director is clearly dedicated to continuing to improve the programs by attending trainings, applying for grants, and looking for opportunities to add additional nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Thank you to the determining official for organizing all information needed in advance of the review. The determining official was available for questions, eager to learn, and dedicated to ensuring success of the child nutrition programs.

Technical Assistance:

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.

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.

Direct Certification (DC)

- 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 recommended to run DC at least once per month and when new or transfer students start at the SFA.
- The effective eligibility date for a DC eligible student is the date of the original output file.

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.

- For income applications, the adult household member must provide the last four digits of their social security number (SSN) or check the box indicating that they do not have an SSN. An income application without an SSN or indication of no SSN is considered incomplete. The determining official should follow up with households that did not provide an SSN as described above. See corrective action below.

Limited English Proficiency (LEP)

- 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) (<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.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- 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 (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. Source documentation means that the information originally used to determine the student's meal eligibility is shared with the school requesting the information for the new or transfer student. Source documentation may include a copy of the original application or a copy of a DC run with the student's name listed. A phone call or copy of a benefit approval letter are examples of documentation that would not be sufficient to establish the new or transfer student's eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on

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

- Please note that disclosure agreements or sharing of information forms are not required when aggregate eligibility data is released to non-food service sources for non-food service related reasons. As stated in the [Eligibility Manual](#): “The LEA may disclose aggregate data to any program or requestor when individual children cannot be identified through release of the aggregate data or by means of deduction [7 CFR 245.6(f)]. An example of aggregate data is the total number of children eligible for free and reduced price meals in the school district. As aggregate data does not identify individual children, parental or guardian notification and consent are not needed. However, LEAs are cautioned about release of aggregate data when individual children’s eligibility may be deduced, such as through the release of data about a specific classroom when the number of eligible children is small.”

Carry-Over

- As a reminder, a new eligibility determination made during the carry-over period replaces the carry-over eligibility status on the date the new determination is made. If the new determination is a decrease in benefit from the carry-over status, the change in benefits must still be made without delay.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding A:** The denial of benefits notification letter, direct certification notification letter, and notice of expiring benefits (end of 30 day carry over) letter do not contain all required content.

Corrective Action Needed for Finding A: The letter templates in Skyward were updated on-site with all required information, including the correct full non-discrimination statements. No further action required.

- ✓ **Finding B:** Of the 214 reviewed eligibility determinations, errors were found on two applications which affected three students total. These two applications did not contain the last four digits of the signing adult’s SSN which makes the applications incomplete. The errors will not result in fiscal action or independent review of applications because they are below the USDA error percentage threshold, however they are recorded on the SFA-1 form.

Corrective Action Needed: The Determining Official contacted the two families by phone during the on-site review to obtain the missing SSN information, thus completing the applications. These errors are considered corrected and no further action is required.

Verification

Technical Assistance:

- The verification pool must be determined based on the number of approved applications on file as of October 1st.
- 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.
- When households submit pay stubs as part of the verification process, the gross income amount and frequency of payments must be verified and compared to the income amounts and frequencies listed on the original application. If an income frequency is unclear or not listed on a submitted pay

stub, the verifying official must contact the family for clarification before proceeding with the verification process.

- When households submit pay stubs as part of the verification process which include overtime pay, the overtime pay must be included in the verification of income if it is earned on a regular basis. However, periodic overtime pay does not need to be included in the verification of income if it is not earned regularly. The verifying official must contact the family for clarification regarding overtime pay if it is listed on submitted pay stubs during the verification process.

Findings and Corrective Action Needed: Verification

- ✓ **Finding C:** The Verification Collection Report (VCR) contained incorrect information in section 4. The approved application information erroneously included applications on file through December 14th.

Corrective Action Needed for Finding C: The correct Skyward report was used to select the verification sample based on applications on file as of October 1st. Use the information from the Skyward report, Skyward student accounts, and paper applications as needed to obtain the correct number of approved applications on file as of October 1st, as well as the number of students for each part of section 4 of the VCR. Submit the corrections for section 4 of the VCR to the consultant. Corrected on-site; no further action required.

Meal Counting and Claiming

Commendations:

- The SFA offers field trip meals for students travelling off-site during the school day. This is excellent as it helps students have access to a nutritious lunch on field trip days.

Technical Assistance:

- 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.
- The SFA correctly uses the Skyward AccuClaims to complete the monthly claim for reimbursement which includes information required of an edit check. The SFA was also utilizing a manual edit check which consolidated all information for each month from all three school sites. This manual edit check is unnecessary because the AccuClaim can meet the edit check requirements on its own. The manual SFA-wide edit checks may be discontinued to ease administrative burden.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

- Thank you to the staff of Tri-County Area School District for their time and cooperation during the Administrative Review. The salad bar is a great addition to the National School Lunch Program and provides a great variety of fresh vegetable options. Efforts to control condiment usage were noted. The signage and portion cups were an innovative addition to the condiment station. Thank you for all of your hard work and dedication to Child Nutrition Programs!

Compliance Reminders:

Updating Crediting Documentation

- Crediting documentation was provided for products that are outdated and/or no longer served in Tri-County Area School District's Child Nutrition Programs.
- As a reminder, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the USDA *Food Buying Guide* (FBG) for School Meal Programs.
- Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.
- CN labels with the "Copy not for documenting Federal Meal Requirements" watermark is not acceptable crediting documentation. As a reminder, it is important to save actual CN labels from product packaging that includes the CN logo, product name, ingredient statement, and inspection legend. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.
- As a reminder, when a CN label is not available for a combination food, meat/meat alternate, or other processed food not found in the FBG, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs.

Whole Grain-Rich Requirement

- All, or 100%, of grains offered and credited in school meal programs are required to be whole grain-rich (WGR). Foods that meet the WGR criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Non-WGR items cannot be credited towards daily or weekly WGR requirements
- Prior to coming on-site, the provided documentation indicated that non-WGR items were served during the week of review. When asked about these items, school nutrition professionals provided product labels of the items that were actually offered during the week of review. While completing the Buy American section of the review, it was noted that there are versions of WGR and non-WGR items in storage. All enriched grain products must be replaced with whole grain-rich versions in order for 100% of grains offered to be WGR.

Grain-Based Desserts

- As a reminder, no more than 2.00 ounce equivalents of grain-based desserts can be offered per week at lunch. Grain-based desserts that are whole grain-rich can count towards the grain component, but grain-based desserts that are not whole grain-rich (made with more than 50 percent enriched grains) cannot count towards the grain component. Grain-based desserts contribute towards the weekly grain-based dessert limit regardless of whether they are whole grain-rich or not (e.g., a slice of cake made with enriched white flour cannot credit towards the grain component, but it counts towards the grain-based dessert limit for the week in which it is served).

Technical Assistance:

Printed Menu

- The printed menu should list all components included with the reimbursable meal. Currently, the daily options of the peanut butter and jelly sandwiches for lunch and choice of cereal for breakfast are not listed on the monthly menu. For menu items offered daily, a statement that says "(menu item) is offered daily as part of the reimbursable meal" may be included instead of listing the menu item daily.

Standardized Recipes

- Standardized recipes are required for all menu items that have more than one ingredient, unless both ingredients are listed on the production record separately (e.g. chicken patty and bun). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe 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, which is crucial for crediting school food service recipes.
- Recipes should be standardized in each kitchen to reflect the products and practices that are used in that kitchen. **This same process must be done to standardize USDA quantity recipes or other quantity recipes used, especially when substitutions are made.**
- While recipes are utilized at Tri-County Area School District, not all recipes are standardized recipes. The standardized recipes that are utilized are lacking essential pieces of information in order to be a standardized recipe including:
 - Ingredients listed with specific names, product numbers, or forms (such as canned, frozen, diced, chopped, etc.)
 - Specific total weight and/or volume of each ingredient (includes herbs, spices, and water)
 - Recipe yield:
 - Total number of portions
 - Total volume or measure (such as gallons, pieces, etc.)
 - Weight or volume in each pan
 - Equipment and serving utensils used

Note: While some of these items are included on some recipes, they are not included on all

- For more information on essential information needed for standardized recipes, please view the [Standardized Recipe Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf).

Cereal and Juice on Production Record

- A variety of cereal and juice are offered daily at breakfast. On production records, these items are listed as “cereal bowls” and “juice.” When items are listed on the menu as a general category, such as cereal or juice, all types of the item need to be listed on the production record. For example, if apple, orange, and grape juice are offered at breakfast, all three juices need to be listed on separate lines of the production record with all required production record information filled in.
- If it becomes too time- or labor-intensive to record cereal and juice usage by type on production records, you may consider using a recipe, similar to a milk recipe. If utilizing a cereal or juice recipe, the recipe should be updated twice per year or when you notice that students’ preferences have changed.

Identifying Food Items on Breakfast Signage

- During breakfast observation, signage indicating the number of food items that could be selected from the grain component was somewhat confusing. The planned menu was either a choice of cereal OR parts of a breakfast sandwich including an English muffin, egg, sausage, or cheese. Breakfast signage indicated that students could only select one food item from the grain component. According to the menu planner, students could only select cereal counting as one food item. If students did not want cereal, students could select a minimum of one food item from the breakfast sandwich (English muffin or egg or sausage) or up to three food items (English muffin and egg and sausage). Technical assistance was provided on-site on how to communicate these options to students.
- Technical assistance was also provided for the cheese slice offered as part of the breakfast sandwich. According to the menu planner, one cheese slice is considered one food item at breakfast. One cheese slice cannot be credited as a food item because one slice of cheese is 0.50

ounce equivalents of meat/meat alternate and therefore cannot credit as one food item. Instead, one slice of cheese should be counted as an extra and not be credited as a food item.

Serving Starchy Vegetables at Breakfast

- On Monday during the week of review, potato circles, from the starchy vegetable subgroup, were offered at breakfast as part of a reimbursable meal. The potato circles were offered without offering other non-starchy vegetables throughout the week during the week of review. If you would like to substitute a starchy vegetable, at least two cups of non-starchy vegetables from dark-green, red/orange, beans and peas (legumes), or other vegetable subgroup must be planned during the week in addition to the starchy vegetable before crediting the starchy vegetable towards the meal pattern. Alternatively, a starchy vegetable may count as an extra and not considered a food item.
- When planning a starchy vegetable as an extra, do not count it as a food item. You are required to plan a full cup of fruit and/or vegetable. The starchy vegetable does not count as part of the $\frac{1}{2}$ cup required fruit and/or vegetable for Offer versus Serve, and the student needs to select three other food items in order to have a reimbursable meal. However, the starchy vegetable still counts towards the weekly dietary specifications. For example, if $\frac{1}{2}$ cup of starchy vegetable (being served as an extra) is on a tray, look for three other items including at least $\frac{1}{2}$ cup of fruit and/or vegetable on the tray as well. Ensure that point-of-service staff is aware of this. This should be communicated to students through breakfast signage.

Salad Bar Portioning Utensils and Signage

- Planned, controlled portion sizes are essential for compliance with meal pattern requirements and dietary specifications. Because the fruit and vegetables on the salad bar are being used to meet the daily fruit and vegetable requirements and the weekly vegetable subgroup requirements, portion sizes of at least $\frac{1}{8}$ cup each should be communicated to students.
- Portion sizes can be communicated to students with signage showing what the intended portion size is/looks like or by using portioning utensils for the intended portion size. For example, signage with how many baby carrots credit as $\frac{1}{2}$ cup may be included. Remember, raw, uncooked leafy greens credit as half the volume served in their fresh forms. For example, if the intended portion size is $\frac{1}{4}$ cup, consider including a photo of what $\frac{1}{4}$ cup of romaine ($\frac{1}{8}$ cup creditable dark green vegetable) looks like or an appropriate portion utensil that fits $\frac{1}{4}$ cup of romaine.
- The FBG should be used to figure out how salad bar options credit when planning portion sizes for options such as baby carrots, green pepper strips, cucumber slices, cherry tomatoes, kiwi wedges, etc. since these items do not credit cup for cup when using a spoodle.

Second Entrees

- Discontinue the practice of offering second entrees free of charge to students. This practice complicates production planning; increases food costs; is discriminatory if only offered to certain students and/or age/grade groups and not all; and increases the likelihood meals exceed the dietary specifications (calories, saturated fat, and sodium). If students are still hungry, second entrees should not be given away. Second entrees should be sold a la carte.
- If students are still hungry and would like more, offer seconds of fruits and vegetables that do not have any additional ingredients, such as butter or whipped topping. If Tri-County Area School District would like to offer seconds of fruit and vegetables, be sure seconds of fruits and vegetables are offered to 4K-8 too, as it would be discriminatory if seconds of fruits and vegetables are only offered to 9-12 students.

Peanut Butter

- Peanut butter is available to students daily. Based on production records from the week of review, 2 quarts, or 8 cups, of peanut butter are consumed daily. Because peanut butter is after the POS, it does not credit as a meat/meat alternate, but it does contribute calories, saturated fat, and sodium.

It is not recommended to leave this item at an unmonitored station, as peanut butter can be a significant source of calories and saturated fat.

Identifying Whole Grain-Rich Items

- The terms “wheat” or “made with whole grains” on a product label do not necessarily mean that a product is WGR. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as WGR. Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients. Note, a recipe that includes 50 percent whole grain and 50 percent enriched grain by weight is considered WGR. USDA has a very thorough [Whole Grain Resource](#) that provides tools and tips for identifying WGR products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

Resources:

The following resources are being provided based on findings, conversations, and requests from the Food Service Director and Head Cook.

Meal Pattern Resources

- Tri-County Area School District follows three meal patterns, K-5, 6-8, and 9-12. For an overview of meal pattern requirements for all age/grade groups, please see the 5-day [Meal Pattern Tables](#) for breakfast and lunch (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables>).

USDA Food Buying Guide

- The [USDA Food Buying Guide](#) (FBG) for School Meals Programs contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods) (<https://foodbuyingguide.fns.usda.gov/>). Foods that do not have standards of identity are not listed in the FBG and require further documentation (a CN label or PFS) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs.

Crediting Grains

- Grains can be credited based on weight using [Exhibit A](#) of the FBG (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). If a product is not on Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the *grams of creditable grain* in the product. Divide this number by 16 grams per ounce equivalent to calculate the grain contribution for that product.

Signage for School Nutrition Professionals

- The [Institute of Child Nutrition](#) has resources with recipe abbreviations, measurement conversions, portioning tools, and steam table pan capacities. Print-outs and posters can be found on their website (<http://nfsmi.org/ResourceOverview.aspx?ID=250>).

Training

- Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [training webpage](#) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (dpi.wi.gov/school-nutrition/directory).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding #1:** There were 25 non-reimbursable meals during breakfast service on the day of observation. Of the 25 non-reimbursable meals, 22 did not contain the required ½ cup of fruit, vegetable, or combination under Offer Versus Serve (OVS). Of the 25 non-reimbursable meals, three of the meals did not contain three food items. Of these three meals, two students left the service line with

only juice and one student left the line with an English muffin and an egg (two food items per the breakfast signage).

According to the Food Service Director, school nutrition professionals have been trained on OVS for breakfast and lunch using DPI SNT's OVS webcast. For an additional resource, please see the [Offer Versus Serve Guidance manual](#) under the Offer Versus Serve heading of the webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>).

Corrective Action Needed for Finding 1: Submit a written statement detailing a plan for how school nutrition professionals will be trained on breakfast OVS. Submit a signed training roster confirming that the school nutrition professionals at Tri-County Area School District have completed the planned OVS training.

Fiscal action will be assessed for these 25 non-reimbursable meals.

❑ **Finding #2:** For the week of review, the chicken stir-fry offered on Monday is unable to be credited based on the recipe provided. After discussing this recipe with the Head Cook, it was clear that the provided recipe is not updated to reflect how this menu item is prepared in the kitchen, the correct quantities of each ingredient, and the correct portion sizes for each age/grade group.

Corrective Action Needed for Finding 2: Submit an updated recipe for chicken stir-fry. ***Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.***

❑ **Finding #3:** The following quantity recipes were utilized at Tri-County Area School District during the week of review:

- Whole Wheat Bread (Tuesday)
- Sugar Cookies (Friday)

Recipes should be standardized in each kitchen to reflect the products and practices that are used in that kitchen. **The recipe standardization process must be completed to standardize USDA quantity recipes or other quantity recipes used, especially when substitutions are made.**

Visit our [Recipe Resources and Tools](#) webpage for additional information on the recipe standardization process (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

We encourage viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<https://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

Corrective Action Needed for Finding 3: Submit standardized recipes for the whole wheat bread and sugar cookie recipes listed above.

❑ **Finding #4:** Production records were missing or did not have the following information filled in based on DPI's [Production Record Requirements](#) ("Must Haves and Nice to Haves") (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>):

- Menu item with recipe name/reference number or specific product name/description
- Planned number of portions (4K-5, 6-8, 9-12, adult, a la carte)
- Total number of purchase units prepared (2-No 10 can, 10 lb case, etc.)
- Milk usage
- Actual number of reimbursable and non-reimbursable meals served
- Special dietary needs meals/food items served

Production records are intended to be useful tools to record information prior to production, during production, and following production. While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). For more information and a complete explanation of production record categories, please see [Instruction for Completing Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).

Corrective Action Needed for Finding 4: Submit one week of completed production records for breakfast and lunch with the above information filled in.

❑ **Finding #5:** There was confusion about utilizing a milk recipe versus recording milk usage on production records. While there are milk recipes for breakfast and lunch for Tri-County Area School District, the milk recipe planned numbers by milk type should not be written into the production record as the amount of milk actually used by milk type each day. Instead, actual milk usage should be recorded.

A milk recipe is documentation of average milk usage by meal (breakfast or lunch) and grade group. When a milk recipe is on file, **total milk usage must still be recorded on production records**. With a milk recipe, milk usage does not need to be recorded by type.

Corrective Action Needed for Finding 5: Please refer to corrective action under **Finding #4**. If choosing to continue to use a milk recipe, submit milk recipe as part of corrective action.

❑ **Finding #6:** Fruit is not recorded on production records for breakfast. Instead, fruit for breakfast and lunch was recorded on salad bar production records without a way to differentiate usage for breakfast versus lunch.

All menu items, creditable and non-creditable, should be recorded on production records. Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes.

Additionally, the specific types of fruit offered, along with planned portion sizes, must be included to document this component was planned and served. Fruit sizes (e.g. case count) should also be recorded, as the case count determines the crediting of fruit.

Corrective Action Needed for Finding 6: Please refer to corrective action under **Finding #4**.

❑ **Finding #7:** Salad bar items do not have planned portion sizes. Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size. Because the salad bar fruits and vegetables count toward the daily 1 cup fruit and 1 cup vegetable

requirement for the 9-12 students, a minimum of 1/8 cup of fruit/vegetable should be offered in ordered to be a creditable amount towards the fruit or vegetable requirement. Please note that leafy greens credit as half the amount.

Planned portion sizes are also required for condiments and should be recorded on production records daily.

Corrective Action Needed for Finding 7: Submit one week of completed salad bar production records for lunch with planned portion sizes for all salad bar items, including condiments.

☐ **Finding #8:** Documentation provided for the week of review demonstrated a weekly grain shortage for breakfast. Cereal is offered daily as a breakfast option. Under OVS, students are only allowed to select 1.00 ounce equivalent (oz eq) of cereal if they choose the daily cereal option. Students are unable to select other food items crediting toward the grain component.

While the daily breakfast grain requirement of 1.00 oz eq grain is met for the 9-12 meal pattern, the weekly breakfast grain requirement is not met if a student were to choose the cereal option every day of the week. If a student were to choose the cereal option every day of the week, the student would only be offered and able to select 5.00 oz eq grain over the course of the week. The weekly breakfast grain requirement for the 9-12 meal pattern is ≥ 9.00 oz eq grain.

Corrective Action Needed for Finding 8: Submit a written statement explaining how the weekly breakfast ≥ 9.00 oz eq grain requirement will be met for the daily cereal option offered. Please include respective serving sizes and labels, if applicable.

Please note, repeat violations of weekly grain shortage during subsequent Administrative Reviews may result in fiscal action.

☐ **Finding #9:** Documentation provided for the week of review demonstrated a daily grain shortage for lunch on Monday. The rice offered with the chicken stir-fry on Monday credits as 1.00 oz eq grain. The daily lunch grain requirement for the 9-12 meal pattern is 2.00 oz eq grain.

Corrective Action Needed for Finding 9: Submit a written statement explaining how the daily lunch 2.00 oz eq grain requirement will be met for this menu item for the week of review and for future service weeks. Please include respective serving sizes and labels, if applicable.

Please note, repeat violations of daily grain shortage during subsequent Administrative Reviews may result in fiscal action.

☐ **Finding #10:** Documentation provided for the week of review demonstrated a daily meat/meat alternate (M/MA) shortage for lunch on Tuesday. The baked ziti on Tuesday credits as 1.00 oz eq M/MA. The daily lunch M/MA requirement for the 9-12 meal pattern is 2.00 oz eq M/MA.

Corrective Action Needed for Finding 10: Submit a written statement explaining how the daily lunch 2.00 oz eq M/MA requirement will be met for this menu item for the week of review and for future service weeks. Please include respective recipes, serving sizes, and labels, if applicable.

Please note, repeat violations of daily meat/meat alternate shortage during subsequent Administrative Reviews may result in fiscal action.

❑ **Finding #11:** Documentation provided for the week of review for the daily peanut butter and jelly sandwich options offered at lunch demonstrated a daily grain shortage Monday-Friday, a weekly grain shortage, a daily M/MA shortage Monday-Friday, and a weekly M/MA shortage.

The daily peanut butter and jelly options (grape and strawberry) at lunch credit as 1.00 oz eq grain and 1.00 oz eq M/MA. The daily lunch grain requirement for the 9-12 meal pattern is 2.00 oz eq grain. The daily lunch M/MA requirement for the 9-12 meal pattern is 2.00 oz eq M/MA. Therefore, the peanut butter and jelly options resulted in daily grain and daily M/MA shortages Monday-Friday.

If a student were to choose the peanut butter and jelly options every day of the week, the student would only be offered and able to select 5.00 oz eq grain and 5.00 oz eq M/MA over the course of the week. The weekly lunch grain requirement for the 9-12 meal pattern is ≥ 10.00 oz eq grain. The weekly lunch M/MA requirement for the 9-12 meal pattern is ≥ 10.00 oz eq M/MA.

Note: Before lunch observation, technical assistance was provided and two peanut butter and jelly sandwiches were offered to students in order to meet daily grain and M/MA requirements for the day of review.

Corrective Action Needed for Finding 11: Submit a written statement explaining how the daily lunch 2.00 oz eq grain requirement, the daily lunch 2.00 oz eq M/MA requirement, the weekly lunch ≥ 10.00 oz eq grain requirement, and the weekly lunch ≥ 10.00 oz eq M/MA requirement will be met for the daily peanut butter and jelly options offered. Please include respective serving sizes and labels, if applicable.

Please note, repeat violations of daily and weekly grain and meat/meat alternate shortages during subsequent Administrative Reviews may result in fiscal action.

❑ **Finding #12:** Documentation provided for the week of review demonstrated the beans/peas vegetable subgroup was missing for the week of review. Vegetables from the beans/peas vegetable subgroup were not planned or offered during the week of review. The weekly beans/peas vegetable subgroup requirement is $\frac{1}{2}$ cup.

Corrective Action Needed for Finding 12: Submit a written statement explaining how the weekly beans/peas vegetable subgroup will be met during the week of review and future service weeks if this weekly menu were served. Please include respective recipes, serving sizes, and labels, if applicable.

Please note, repeat violations of any missing vegetable subgroups during subsequent Administrative Reviews may result in fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations:

- The bookkeeper is knowledgeable about the food service accounting procedures and does an excellent job tracking financial information related to food service.

Technical Assistance:

Annual Financial Report (AFR)

- The AFR submitted by the SFA has all expenses broken out for NSLP, but has minimally allocated expenses, equipment, purchased services, and other expenses to the other nutrition programs offered. 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; this will aid the school in calculating its “yearly” reference period for non-program food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](#) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](#) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).
- 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](#) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- The SFA’s unpaid meal charge policy includes language pertaining to alternative meals being offered after certain negative balances are reached. The alternative meal listed for breakfast is a “basic daily breakfast” and for lunch is a “basic daily lunch,” meaning that students always receive the regular meal offered (not a specific alternative meal) regardless of account balance. This section of the policy may be confusing because there is not actually a different alternative meal being offered to students with negative balances. Please note that there is not a requirement to have language in the unpaid meal policy about alternative meals if they are not offered. Consider editing this section of the policy when it is next reviewed to increase clarity. Reference the alternative meals section of [USDA-FNS Overcoming the Unpaid Meal Challenge](#) for more information (<https://fns-prod.azureedge.net/sites/default/files/cn/SP29-2017a1.pdf>).

Revenue from Non-Program Foods

Technical Assistance:

Non-Program Foods

- Non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Events, and Food Service operated Vending Machines. The food items purchased by the foods service director, some of which are occasionally prepared by food service staff for the purchasing organization, which are

then sold to various organizations for their use in their events is considered “catering.” Examples of these caterings would be food service purchasing ice cream on behalf of the National Honor Society, which then reimburses food service the cost of the food.

- All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit. See corrective action below related to catering pricing.
- Because only, extra milks, adult meals, and sporadic catering items are being sold as non-program foods, the USDA Non-program Revenue Tool is not required. If the SFA begins selling any additional non-program foods, such as extra entrees or snack foods, then the tool will be required to assess if costs and revenues are meeting requirements.

Resources

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

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

❑ **Finding D:** Currently, the food service director is charging organizations the cost of food only for catering events described above. Charging for food cost alone does not account for the labor involved in ordering, receiving, and preparing these food items. Labor must be included in the invoiced cost the food service department charges to the purchasing organization. Additionally, if napkins, utensils, or any other supplies are provided as part of the food order, these items should be costed out and included in the invoiced cost.

Corrective Action Needed for Finding D: Provide a written example of how labor costs associated with catering will be accounted for and appropriately charged to the purchasing organizations going forward.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

Nondiscrimination Statement

- When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) 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. See corrective action below.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. See corrective action below.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. See corrective action below.
- 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. Be sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. 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](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](#) resource.

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.
- 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.

Findings and Corrective Action Needed: Civil Rights

- ✓ **Finding E:** The food service webpage that includes the lunch menu and free/reduced price meal application information does not contain the appropriate full non-discrimination statement.

Corrective Action Needed for Finding E: Work with the appropriate staff members to update the food service webpage so that it contains the correct full non-discrimination statement. Notify the consultant when the webpage has been updated. Corrected on-site; no further action required.

- **Finding F:** The bookkeeper whose duties involve financial management of food service has not completed the required annual civil rights training.

Corrective Action Needed for Finding F: Please notify the consultant via email when the training has been completed.

Local Wellness Policy

Commendations:

- The Local Wellness Policy created and implemented in the SFA is excellent and contains all required content. The policy is available on the district website in its most updated version. It was clear when reviewing the policy, wellness committee documents, and other supporting information that the SFA and community members are dedicated to student wellness. The wellness committee contains a well-rounded group of members from the schools and surrounding community.

Technical Assistance:

- During the next revision of the wellness policy, consider adding specific language pertaining to Smarter Lunchroom techniques as they pertain to nutrition promotion.
- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.
- Additionally, the SFA is required to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which

the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Smart Snacks in Schools

Updated 4/30/18

Compliance Reminders:

Final Rule

- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>)

School Day

- All foods (vending machines, school stores, fundraisers, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the “Smart Snacks” regulations.

Competitive Food Sales

- There are two situations by which an organization may sell foods and beverages to students during the school day.
 1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
 2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards:
 - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two **consecutive** weeks in length.
 - b. Exempt fundraisers cannot occur in the meal service area during meal times.
 - c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser.

Fundraisers

- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers are required to be documented. While copies of fundraising tracking tools were provided to the principal by the Public Health Nutritionist, electronic versions of the fundraiser tracking tools can

also be found on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Technical Assistance:

Nutrient Standards for Competitive Foods:

- Nutrient standards should be assessed for the serving size available for purchase. All competitive foods sold during the school day must meet all of the following standards:
 - Calories
 - Entrée: ≤350 calories
 - Snack or side: ≤200 calories
 - Fat
 - ≤35% of total calories from fat
 - *Exemptions:* reduced-fat cheese, part-skim mozzarella, nuts, seeds, nut/seed butters, dried fruit with nuts or seeds (with no added nutritive sweeteners or fat), seafood with no added fat, and eggs
 - <10% of total calories from saturated fat
 - *Exemptions:* reduced-fat cheese, part-skim mozzarella, nuts, seeds, nut/seed butters, dried fruit with nuts or seeds (with no added nutritive sweeteners or fat), seafood with no added fat, and eggs 0 g of trans fat (<0.5 g)
 - Sodium
 - Entrée: ≤480 mg
 - Snack or side: ≤200 mg
 - Sugar
 - ≤35% of weight from total sugar
 - *Exemptions:* dried/dehydrated fruits or vegetables without added nutritive sweeteners, dried fruits with nutritive sweeteners for processing and/or palatability, and dried fruit with only nuts/seed (no added nutritive sweeteners or fat)

Beverages

- If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, at Tri-County Area School District, a vending machine with beverages is available to 7-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group. Therefore, items like caffeinated, low-calorie (≤5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (<5 kcal/8 fluid oz.; ≤10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable. The following beverages would be allowable:
 - Water- all sizes
 - Low-fat milk (unflavored)- ≤12 fl oz
 - Fat-free milk (flavored or unflavored)- ≤12 fl oz
 - 100% juice- ≤12 fl oz

Smart Snacks Product Calculator

- The Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage, is an excellent tool to assess product compliance (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

Findings and Corrective Action Needed: Smart Snacks in Schools

☐ **Finding G:** Of the products reviewed, the following products sold to 7-12 students at Tri-County Area School District during the school day are not compliant based on Smart Snacks nutrient standards:

- 1.5 oz Garden Salsa SunChips (>200 calories, >200 mg sodium)
- 1.0 oz Cheddar Goldfish (first ingredient is not whole grain; enriched wheat flour, >200 mg sodium)
- 1.75 oz Traditional Chex Mix (>200 calories, >200 mg sodium)
- 1.25 oz Funyuns (>200 mg sodium, >35% calories from fat)
- Microwave Popcorn (>200 calories, >200 mg sodium, >35% calories from fat, >10% calories from saturated fat)
- Whatchamacallit candy bar (first ingredient sugar, >200 calories, >35% of calories from fat, >10% of calories from saturated fat, >35% of total weight from sugar)
- 3 Musketeers (first ingredient sugar, >200 calories, >10% of calories from saturated fat, >35% of total weight from sugar)
- 1.42 oz Munch Peanut Bar (>200 calories, >35% calories from fat, >10% of calories from saturated fat)

Corrective Action Needed for Finding G: Submit a written statement explaining your plan for how and when competitive foods in vending machines will be compliant with Smart Snacks regulations.

☐ **Finding H:** The following products sold to 7-12 students at Tri-County Area School District during the school day are not compliant based on Smart Snacks standards for beverages for the youngest age/grade group:

- 20 fl oz Powerade Zero, numerous flavors (no-calorie beverages)
- 16.9 fl oz Minute Maid Sparkling Juices (not compliant for any grade group based on calories and fl oz)
- 20 fl oz Coke Zero (no-calorie beverage)
- 20 fl oz Sprite Zero (no-calorie beverage)
- 20 fl oz Mello Yello Zero (no-calorie beverage)

Corrective Action Needed for Finding H: Submit a written statement either confirming that non-compliant beverages will not be sold or explaining how Tri-County Area School District will ensure that each grade group will only have access to beverages that are compliant for their grade group.

☐ **Finding I:** Tri-County Area School District holds fundraisers that sell non-compliant products during the school day. These fundraisers are not tracked.

Corrective Action Needed for Finding I: Submit a written statement explaining how Tri-County Area School District will bring all food and beverage fundraisers into compliance, with compliant products or compliance to the exempt fundraiser rules. Include specifics on who at the school will be responsible for tracking exempt fundraisers and how documentation will be kept.

Professional Standards

Commendations:

- The tracking tool used to track professional standards hours is detailed and clearly shows how much training each staff member has received. It is clear that the current tracking system works well for the staff members involved. The variety of trainings staff members tracked were varied in subject and indicative of dedication to individual job duties.

Technical Assistance:

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.

Non-Nutrition Staff Requirements

- The bookkeeper is responsible for financial management of the food service account and associated programs, and is thus considered a part-time non-nutrition staff member. This designation and associated job duties requires four hours of annual professional standards training. Technical assistance was provided to the bookkeeper about professional standards requirements, training opportunities, and tracking procedures.

Student Workers

- Student workers are not subject to professional standards requirements, but should receive adequate training to complete their designated duties safely and effectively.

Food Safety, Storage and Buy American

Technical Assistance:

Buy American

- 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, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - The following products may be exceptions to the Buy American provision: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
 - If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the

- U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted in an email.
- What is acceptable to determine compliance on a label? Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
 - Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
 - Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
 - The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
 - 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, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Food Safety

- All food handlers must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>). This includes student workers that will be working in the kitchen area. See corrective action below.

Findings and Corrective Action Needed: Food Safety, Storage and Buy American

□ **Finding J:** The following products were identified in Tri-County Area School District's storage areas as non-domestic. While Tri-County Area School District has started to track non-compliant products through DPI's template, there are not forms for all products and all forms are not fully filled out for the following products:

- Canned pineapple- product of the Philippines
- Cantaloupe- product of Honduras
- Yellow bell pepper- product of Mexico
- Green bell pepper- product of Mexico

Corrective Action Needed for Finding J: Continue using a Noncompliant Product List for tracking non-domestic products. Provide copies of completed forms for non-compliant products currently in Tri-County Area School District's food storage areas. Provide the completed list as corrective action. The [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

❑ Finding K: The following products identified in Tri-County Area School District's storage did not have proper labeling to identify the country of origin:

- Dry mashed potatoes- distributed ID
- Vegetable oil- distributed TX
- Ranch dressing- distributed TX
- BBQ sauce- manufactured CA
- Garlic salt- packed in USA
- Garlic powder- packed in USA
- Ardmore juice- OH
- Frozen potato wedges- packed in IL
- Frozen, diced potatoes- packed in MI
- Franks- distributed TX
- String cheese- distributed TX
- Fresh tomatoes- packed by a distributor in Mexico

Technical Assistance, No Corrective Action Needed for Finding K: In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the above section for sample certification language. This will be treated as technical assistance for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

✓ **Finding L:** Student workers must have signed employee reporting agreements on file. This ensures that they are aware of what illnesses or symptoms would prohibit or restrict them from working with and around food.

Corrective Action Needed for Finding L: The food service director obtained signed agreements from all student workers during the on-site review. The student workers had previously received training on the content of the agreement, but now have the signed form on file to go along with the prior training. No further action required.

❑ Finding M: The food safety plan did not contain a standard operating procedure (SOP) for the Fresh Fruit and Vegetable Program (FFVP).

Corrective Action Needed for Finding M: Please develop a site-specific SOP for FFVP and add it to the current food safety plan. Submit a copy of the completed SOP to the consultant.

Technical Assistance:

Breakfast Promotion

- The SFA did an excellent job promoting the breakfast program through newsletters, school website, monthly menus, and posters.
- To continue increasing and promoting breakfast participation, explore utilizing alternative breakfast models and promotional strategies. 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.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

Summer Meals

- The SFA offers summer meals for students in the area and does a great job promoting the feeding program. The SFA utilizes multiple outlets to notify families of the availability of free breakfast and lunch offered during the summer.
- Some additional options for informing families of summer meals include the following methods:
 - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)
- Resources:
 - To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
 - For more information on Summer Feeding option contact:

- Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
- Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

5. OTHER FEDERAL PROGRAMS REVIEWS

Fresh Fruit and Vegetable Program (FFVP)

Commendations:

- Thank you to Tri-County School District for participating in the Fresh Fruit and Vegetable Program. A special thanks to the FFVP Coordinator for providing documentation and answering questions for the claim validation. It was noted that the FFVP Coordinator distributes nutrition activities and nutrition education materials to teachers. These additions to the program are excellent ways to teach students about fruits, vegetables, and nutrition. The picture in the napkin holder on the FFVP cart of the fruits and vegetables is another great addition!

Technical Assistance:

Claim Validation

- The claim validation showed that all costs claimed were accurate and allowable. Excellent job!

Dips

- While dips were not served on the day of the FFVP on-site review, it was explained that ranch dressing that is 9.0 grams of fat per serving is served with certain FFVP vegetables. The FFVP guidelines state that if dips are served with vegetables, they must be low-fat or non-fat. The definition of low-fat is 3 grams of fat or less per serving and less than 0.5 grams of fat per serving for non-fat.

Food Safety and Sanitation

- Tri-County Area School District does not have a FFVP Standard Operating Procedure (SOP). An example of a FFVP SOP can be found on our [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety#templates) webpage (https://dpi.wi.gov/school-nutrition/food-safety#templates). If you choose to use the FFVP SOP on the website, please edit it to suit the needs of your operation. **Please see corrective action in Food Safety section of the report for FFVP SOP corrective action needed.**

Resources:

Additional Promotion Materials

- DPI SNT recently released over 75 new fruit and vegetable fact sheets that can be used for FFVP. The fruit and vegetable facts sheets and other materials can be found on the [FFVP Promotion](https://dpi.wi.gov/school-nutrition/ffvp/promotion) webpage (https://dpi.wi.gov/school-nutrition/ffvp/promotion).

Findings and Corrective Action Needed: FFVP

❑ **Finding N:** Technical assistance was provided to the Food Service Director/FFVP Coordinator via email in October about the ranch dressing that is served with FFVP snack. The ranch dressing that is served with FFVP snack is 9.0 grams of fat per serving and is therefore not low-fat or non-fat dip.

Corrective Action Needed for Finding N: Submit a statement confirming understanding that only low-fat or non-fat dips can be served with FFVP vegetable snacks.

Wisconsin School Day Milk Program (WSDMP)

Technical Assistance:

- Because the review site does not offer WSDMP, a comprehensive review of this program was not conducted. However when the SFA operates WSDMP in non-reviewed sites, the yearly claim from the prior school year is validated as part of the review. Validation of the WSDMP claim for school year 2016-17 revealed an underclaim of 48 milks. Technical assistance was provided to staff members involved in the claim submission to clarify which numbers of the annual Skyward reports should be used when completing the WSDMP claim.
 - The cost per half pint of milk for the SY 16-17 claim was determined based on the total half pints purchased divided by the total amount paid to the supplier for the milk. This calculation provides a weighted average price per carton, which is the acceptable method for determining per unit cost.
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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 webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!