

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

School Food Authority: Omro School District
School(s) Reviewed: Patch Elementary School
Agency Code: 704088

Review Date(s): 1/8/19–1/10/19
Date of Exit Conference: 1/10/19

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state 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 Omro School District for the courtesies extended during the on-site review. Thank you for being available for answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The staff members did an excellent job preparing for the review, and were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the nutrition programs. The food service staff were welcoming, knowledgeable, and clearly dedicated to their work.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Technical Assistance:

Error Percentage

- Of the 214 eligibility determinations reviewed, 33 errors were identified. These errors have been recorded on the SFA-1 form and are used to determine an error percentage. The error percentage was 15.4%, which exceeds the 5% threshold for an independent review of applications. An independent review of applications will be required for the school year 2019-20. Specific information regarding the independent review of applications will be sent in late spring or early summer. The error percentage also exceeded the 3% threshold for fiscal action, so fiscal action will be calculated for benefits issuance errors. An additional 14 errors were identified outside of the benefits issuance sample. These errors have been recorded on the SFA-2 form and are not used to determine error percentages, but do require correction.

Effective Dates for Extended Benefits

- Two students that were receiving benefits by extension from a directly certified household member had effective dates from prior school years. These were not recorded as errors because documentation supported that these two students were eligible for benefits in the current school year via extension. The determining official worked with the software vendor to get the effective dates corrected to reflect dates from the current school year when the benefit extension was established for the 2018-19 school year.

Application Denial Letters

- As described on page 56 of the [Eligibility Manual](#), the household notification of denial must advise of the following (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>):
 - Reason for denial of benefits
 - Right to appeal
 - Instructions on how to appeal
 - Ability to reapply for benefits at any time during the school year
- Please reference the [DPI Approval/Denial template letter](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/letter-to-households.doc>).

Transferring Students

- Transferring the eligibility determination between Local Educational Agencies (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. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.
- 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 direct certification 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.

Disclosure and Sharing of Information

- 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](#) 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 individual 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 Agreement for School Staff](#) form is located on the SNT website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>). An example would be a school secretary receiving a student's free/reduced eligibility information with parental consent for the purpose of waiving school registration fees—the secretary in this scenario should complete a disclosure form.

Extension of Benefits

- The effective date of a benefit established via direct certification extension (such as by a sibling or other household member) is the date that the determining official receives documentation or knowledge of the shared household members.

Expiring Benefits Letter

- DPI has a [template letter](#) that can be used when notifying households that their benefits will expire at the end of the 30 day carryover period (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expiring-benefits-template-letter.doc>). Please reference and utilize the template letter as needed.

Paper Applications

- When the determining official reviews paper applications, the “office use only” section on the back of the application should be completed with income, household size, determination, official signature and date.

Online Applications

- To assist in close management of the free/reduced benefit management, it may be beneficial to print all applications submitted electronically. The determining official could then review the applications, sign, date, and retain the printed copies for reference. Please reference pages 72, 80, and 81 of the [Eligibility Manual](#) for additional information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Training

- It is highly recommended that the staff members involved in benefit issuance seek out training opportunities pertaining to free/reduced meal benefit management. Please explore the [DPI webcasts](#) for pertinent topics (<https://dpi.wi.gov/school-nutrition/training/webcasts>). In-person training opportunities are posted on the [Training webpage](#) as they become available (<https://dpi.wi.gov/school-nutrition/training>). The School Nutrition Team hosts several summer training sessions across the state which can be beneficial. Be sure to track any training completed for professional standards credit.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding 1:** Roles of officials involved in benefit issuance and verification were not clearly defined and the actual roles/duties did not match the officials designated on the online contract. Staff changes in the district during the school year resulted in shifting and reassigning of benefit issuance duties.

Corrective Action: Determine which staff members will complete which tasks involved in benefit issuance management in the next school year. Submit a written statement to the consultant describing who will be responsible for each piece of benefit issuance management going forward. Please be detailed in the statement and be sure to include the names of the people that will be designated as the determining, confirming, verifying, and hearing officials on the online contract. The statement should also include any trainings planned for staff members that will be involved in benefit issuance to ensure the process is understood and regulations are followed. The responsibilities of the steps in the carryover process should be detailed in the statement to ensure carryover issues, such as those discovered on the review, do not occur in the future.

- ❑ **Finding 2:** Of the 33 errors included in the review sample and the additional 14 errors outside of the sample, 40 were due to failure to properly implement the 30 day carryover. Forty students that were supposed to have their 2017-18 benefits discontinued on the 30th operating day in 2018-19 school year did not drop off and change to paid on the appropriate date.

The determining official (DO) was made aware of this error during preparation for the administrative review. Prior to the on-site review, the DO and business manager began attempting to resolve these errors by changing 32 of these students to paid in the software system with the effective date of 10/19/18 (the day after the end of carryover). They notified these families on 1/3/19 that they would be changed to paid and would be responsible for paying full-price for meals beginning on 1/4/19. The DO and business manager were then planning to make a fund transfer to cover consequent debts and potentially modify claims to reflect the changes to paid status as of 10/19/18.

This is not how such errors should be corrected when discovered on review, so technical assistance was provided. The 32 errors the SFA attempted to resolve prior to the review were recorded on the SFA-1 and SFA-2 review forms with the date of correction 1/3/19 (the date the letter was sent to households). The SFA was advised not to make a fund transfer as was planned and not to modify any claims, as fiscal action in the context of the administrative review will account for the financial implications of these errors. The SFA was advised to work with the software vendor to undo the changes to the students' effective dates for their paid statuses as of 10/19/18—the effective dates should be 1/4/19. Getting the effective dates changed back from 10/19/18 to 1/4/19 for the paid statuses should wipe out any debt the households were shown to have accrued as a result of the change to paid with the 10/19/18 effective date.

Corrective Action: Provide written confirmation that the software vendor has been contacted for assistance with adjusting the effective dates for these carryover errors. ***Fiscal action will be assessed for these errors.***

- ✓ **Finding 3:** As described in Finding 2, of 33 errors included in the review sample and the additional 14 errors outside of the sample, 40 were due to failure to properly implement the 30 day carryover. Forty students that were supposed to have their 2017-18 benefits discontinued on the 30th operating day in 2018-19 school year did not drop off and change to paid on the appropriate date. Thirty-two of these 40 students were handled in the manner described in Finding 2. There were

eight students that did not properly drop off and change to paid after carryover ended that were not yet corrected at the time of the on-site review.

Corrective Action: For the eight students that were uncorrected carryover errors, household notification and change to the benefit status in the software system is needed. Send the households a letter explaining that they are no longer eligible to receive meal benefits because the carryover period has ended and a new eligibility determination has not been made for the 2018-19 school year. Notify the households of the specific date their benefit will be changed to paid, and change each student to paid in the software system on the specified date. It is also advisable to notify the households of this change via phone or email to ensure funds are put into student accounts to pay for meals. Submit copies of the letters sent to the consultant. *Corrected; no further action required. Fiscal action will be assessed for these errors.*

- ✓ **Finding 4:** Three students were receiving benefits without supporting eligibility documentation on file for the current school year. The effective dates for these students indicated that they were not part of the carryover issue described in Findings 2 and 3.

Corrective Action: The determining official sent these three households letters of adverse action notifying them that their benefits would be discontinued and that they would be changed to paid status 10 days after the date the letter was sent. These students must be changed to paid status after the 10th day in the software system, unless documentation is submitted within the 10 days that establishes benefit eligibility. *Corrected; no further action required. Fiscal action will be assessed for these errors.*

- ✓ **Finding 5:** Two approved applications affecting two students total were incomplete due to missing household members information.

Corrective Action: While on-site, the determining official contacted the two households to obtain the missing information. The missing information was filled in on the application by the determining official based on conversations with the households, therefore completing the applications. The information gathered resulted in both household retaining the benefits for which they were initially approved. *Corrected on-site; no further action required. Fiscal action will be NOT assessed for these errors.*

- **Finding 6:** The application denial letter did not convey the reason for denial, as is required. Additionally, the denial and approval letters contained non-discrimination statements that were inappropriately formatted. The statement must be in the same size font as the rest of the document and must retain its original spacing. Additionally, stating that an application is “denied” rather than “approved as paid” or “approved as normal” may be a clearer, more accurate way to convey denial of benefits – this is not a requirement, but a recommendation.

Corrective Action: Update the denial and approval letters and send to the consultant when completed. It is highly recommended to reference the [DPI approval/denial template letter](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/letter-to-households.doc) when revising the letters (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/letter-to-households.doc>).

- **Finding 7:** The direct certification (DC) notification letters must be updated. The letter does not convey that Medicaid and FDPIR are also assistance programs that could result in meal benefits through direct certification. The letter does not inform households that children that are reduced-eligible by DC could qualify for free benefits via an application. The non-discrimination statement should also be reviewed to ensure proper sizing and formatting.

Corrective Action: Update the DC letters accordingly to contain the information described above. Submit a copy of the updated letter template to the consultant. It is recommended to use the [DPI DC template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter.doc) as a reference when updating the letter (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter.doc>).

- ❑ **Finding 8:** Discussions with school officials indicated that some fees may automatically be waived when a student is entered into the software system as free/reduced eligible. Parental consent is required for each individual fee waiver based on free/reduced eligibility and consent must be obtained each year. Fees cannot automatically be waived based on meal benefit status. See Disclosure and Sharing Information technical assistance above.

Corrective Action: Submit a written plan describing how fee waivers will be properly handled for next school year. Please be specific and describe how parental consent will be obtained to use free/reduced information for each specific fee waiver or other non-program purpose.

Verification

Technical Assistance:

Error Prone

- An application is considered “error prone” if the reported income is within \$100 per month or \$1200 per year of the applicable income eligibility guidelines. While all applications submitted have the potential to contain errors, the term “error prone” is only used to describe applications within the income range described above.
- Please note that the standard sample size for verification requires that applications selected for verification be chosen from error prone applications approved as of October 1. On the verification collection report, the SFA reported that standard sample was used but the verified applications were not error-prone--alternate one sample was actually used. See corrective action below.

Official Roles

- The determining official is responsible for processing submitted applications and determining the benefit the household is eligible for. Before verification activities can begin, a designated confirming official must review each approved application selected for verification to confirm that the initial benefit determination was accurate. After the confirming official confirms the initial determination on the selected applications, then the verifying official may begin the verification process by contacting the household to request supporting documentation. If the confirming official disagrees with the initial determination, then specific procedures must be followed to proceed with verification. Please reference pages 103-104 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) for additional information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Required Follow Up

- While the verifying official (VO) did appropriately follow up with non-responsive households selected for verification, it is important to understand the follow up requirements. The VO must make at least one attempt to contact a household when the household does not adequately respond to the request for verification. This follow up can be by mail, email, telephone, or text message. The VO must document that a follow up contact was attempted. Please reference page 112 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Findings and Corrective Action Needed: Verification

- ❑ **Finding 9:** The letter sent to households notifying them of their selection for verification (often referred to as a “We MUST Check Letter”), did not meet the requirements described on page 106 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Corrective Action: Update the verification notification letter so that it meets the requirements. It is recommended to use the [DPI template letter](#) as a guide when updating this letter. Submit the updated

letter template to the consultant (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-we-must-check.docx>).

- ❑ **Finding 10:** There was no documentation available that indicated that a confirmation review occurred during the verification process. It was verbally stated that a confirmation review occurred, but there was no documentation supporting this. The confirming official must review the applications selected for verification to assess the initial eligibility determination and then must sign and date the application prior to contacting the household to request verification materials. Please reference pages 103-104 of the [Eligibility Manual](#) for more information about confirmation reviews (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Corrective Action: Provide a written statement describing how the confirmation review will be conducted and documented next year. This may be included with the statement for Finding 1.

- ✓ **Finding 11:** One household selected for verification was incorrectly changed from reduced to paid status after submission of proof of income. The income information submitted supported retention of the reduced benefit status.

Corrective Action: Send the household a written notification of the increase in benefits as a result of the administrative review. Change the students to reduced status in the software system within three calendar days. *Corrected on-site; no further action required.*

- ❑ **Finding 12:** During verification, the verifying official concluded that one household was no longer eligible to receive reduced price benefits. While this conclusion was ultimately incorrect (as described in Finding 11), at the time of verification that household should have received a written letter of adverse action. The verifying official did not notify the household in writing that their benefit would decrease and the household was not given 10 days to appeal prior to the decrease in benefit, as is required.

Corrective Action: Provide a written statement acknowledging the requirement to provide households a notice of adverse action in writing when a decrease in benefits results from verification. Please reference page 57 and the Verification section of the [Eligibility Manual](#) for details on adverse action, including what is required to be included in a notice of adverse action (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

- ✓ **Finding 13:** The verification collection report (VCR) contained several errors. The sample selected was “standard sample,” but alternate one was actually used. Additionally, one of the two verified applications was incorrectly changed to paid status after income information was received. The VCR should reflect that this household was reduced and stayed reduced after verification, since this correction is occurring as part of the administrative review.

Corrective Action: The VCR must be unlocked by DPI before the SFA can make edits. The consultant will notify the SFA when the report has been unlocked and is available for editing. Once the report is unlocked, correct and resubmit the VCR. Notify the consultant when the corrected report has been submitted. *Corrected; no further action required.*

Meal Counting and Claiming

Commendations:

- The use of ID cards for students at the point of service (POS) at Patch Elementary appeared highly effective. The students seem to be well-educated on the card-in-the-bucket POS at meal times. The teachers and food service staff do good job ensuring that students put their cards in the right bucket (meal or milk only) and take the corresponding items.

Technical Assistance:

Visiting Students

- Please note that SFAs may claim visiting students outside of the district in the paid category or the individual's benefit category with documentation, unless they are from a CEP school. In order to ensure the full meal cost is covered when serving visiting students, it is recommended to either charge the student the paid student price and claim in the paid category, or charge the adult meal price and not claim the meal. Simply charging the paid student price but not claiming for reimbursement will likely not cover the entire cost of the meal.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding 14:** The AccuClaim report was not used for claim submission. A monthly transaction report has been used to complete claims, and this report does not match the corresponding Accuclaim data. The AccuClaim report must be used for claim submission because it is the only report in the software system that provides a daily breakdown of number of meals served by eligibility category by site. AccuClaims ("edit checks") must be carefully reviewed monthly prior to claim submission. While the claim preparer stated that the AccuClaim is reviewed monthly, it did not appear that this edit check process was adequately completed. There were several days in earlier months when some students from one school were counted at a different school, and this error was not caught and corrected during the AccuClaim review. The claims submitted since the beginning of the school year do not match the AccuClaims and thus fiscal action must be assessed for these claiming errors.

Corrective Action: The claim preparer has submitted AccuClaim reports to the consultant for September through December for all schools to assist in calculation of fiscal action. However, additional corrective action is needed to resolve this issue. Please submit a statement describing how review of AccuClaims (edit checks) will be conducted prior to claim submission going forward. The numbers on the AccuClaim report must be the numbers entered on claims. The edit check procedure must include:

- A comparison of each school's daily lunch and breakfast counts to the number of eligible students in each eligibility category to ensure that more students are not claimed than are eligible in any category on any given day.
- An edit check of each school's daily counts of free, reduced price and paid lunches against the product of the number of children in that school currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor (as described in 7 CFR 210.8).

It is strongly recommended that the procedures also include:

- An edit check of each school's daily breakfast counts free, reduced price and paid lunches against the product of the number of children in that school currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor.

- ✓ **Finding 15:** During the review of the AccuClaim (edit check) for the review site for the review period, it was discovered that some student breakfasts were entered into the wrong school site on one day. This error was due to the POS process for breakfast at one of the sites.

Corrective Action: The claim preparer investigated the issue and corrected it in the software system. The students that were counted at the wrong site were manually changed to be counted at the correct school on the date in question. The corrected edit check was submitted to the consultant. *Corrected; no further action required.*

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Many thanks to the food service director and all the nutrition professionals who work hard every day to provide well balance and healthy meals to the children at Patch Elementary School. The nutrition professionals were positive, enthusiastic, friendly, personable, and worked well with the students. Thank you also to the kitchen staff at Omro Elementary School for doing a great job preparing healthy and safe meals for students. Offering so many fresh fruit and veggie options on the garden bar is wonderful to see. Students took a variety of these foods, which encourages healthy, lifelong eating habits. Thank you for sending the needed documents in plenty of time to review before the on-site portion of the administrative review.

Technical Assistance:

Training

- Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage, under Upcoming Trainings (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts) webpage (<https://dpi.wi.gov/school-nutrition/training/webcasts>).
- Regular trainings are offered on the Wisconsin Department of Public Instruction (DPI) webpage as webcasts, webinars, and on-site trainings. Check the [Training](https://dpi.wi.gov/school-nutrition/training) webpage often for current and upcoming opportunities (<https://dpi.wi.gov/school-nutrition/training>). Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](https://dpi.wi.gov/school-nutrition/directory) can be found on the website (<https://dpi.wi.gov/school-nutrition/directory>).

Offer Verses Serve

- Offer versus Serve (OVS) is not required for grade K-8 students, although it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, grade K-8 students must be served $\frac{3}{4}$ cup vegetable and $\frac{1}{2}$ cup fruit to create a reimbursable meal. If OVS is implemented, then students can choose three of the five components offered, including at least $\frac{1}{2}$ cup fruit, vegetable, or combination to create a reimbursable meal.
- Patch Elementary School staff (aids and teachers) helping with meal service were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. Although all students observed at lunch took a reimbursable meal, it is important for school staff, food service, and volunteers to fully understand the OVS requirements. It is advisable to offer refresher trainings for all staff on a regular basis. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) and the [Offer Versus Serve Webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) can be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts>).

Signage

- Patch Elementary School serves children in K4, K5, and 1st grade. While the current lunch sign needs to be updated, the school nutrition professionals at Patch Elementary School have found pictures of each food item offered at lunch and have put them on the sign for all students to see. It is also encouraged that the nutrition professionals create visual pictures for the breakfast signage.
- The fruits and vegetables on the garden bar are being used to meet the weekly fruit and vegetable requirements, therefore portion sizes of at least $\frac{1}{8}$ cup each should be communicated to students with signage. Customizable [Salad/Garden Bar Signage Template](#) can be found on the [Signage](#) webpage, under the heading Additional Signage Resources

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>); (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

- The National School Lunch Program (NSLP) regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at breakfast and lunch. Samples of signage that can be printed or updated and implemented in the SFA can be found on the [signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) web page (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Production Records

- Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.
- Be specific on production records about the identity, brand, and description of the items served. Instead of “fruit cup,” list both the applesauce cup and the diced peaches cup separately. List the specific type of granola bar or cereal offered, and all types/flavors when more than one flavor is offered, rather than just listing “cereal bar” or “granola bar” as these do not indicate exactly what was served. There is a wide variation in formulation of the many products that fall into these categories. Fruit sizes (e.g. case count) should also be recorded. It is helpful to include not just portion size, but also crediting, on the production records.
- A list of production record requirements (“[Must Haves and Nice to Haves](#)”) and sample production record templates can be found on the [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Standardized Recipes

- Recipes should be updated to reflect current practices and products. Standardized recipes exist, but may not accurately reflecting what is happening in the kitchen. For more information on what essential information must be on a standardized recipe, review the [Standardized Recipe Checklist](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- Finding 16:** Current posted lunch signage is out of date and does not contain the statement, “*student must take at least ½ cup fruit and/or vegetable, or a combination.*”

Corrective Action: Please update signage, and submit a picture of the new lunch sign in place at Patch Elementary School.

- Finding 17:** Current breakfast signage is correct, however, it is not posted in a visible location for students to see and on the day of observation the signage not completed.

Corrective Action: Please post in a more visible area for all students to see. Each day the menu needs to be filled in. The combination of pictures and words is acceptable. Please send the public health nutritionist (PHN) a picture of the breakfast sign in a more visible place properly completed.

- Finding 18:** Garden Bar signage is currently placed too high for students to see. Placing signage at eye level for students is necessary to help educate students. It is recommended that the nutrition professionals on site figure out how many of each item equals to ¼ cup. For example how many baby carrots the student would need to take in order to have ¼ cup of baby carrots, this information would then need to be communicated to students.

Corrective Action: Please submit to the PHN a detailed statement of how this process will be carried out on a daily and or weekly basis, and a picture of the garden bar with signage in place.

- ❑ **Finding 19:** The lunch Offer versus Serve (OVS) requirements are not fully understood by all staff at the point of service. Although no non-reimbursable meals were observed during the days of onsite review, a few students were made to take more than what they needed at lunch.

Corrective Action: Have staff responsible for determining reimbursable meals attend a training on OVS. The [lunch meal pattern](#) and [OVS](#) webcasts may be used, or another training of choice (<http://dpi.wi.gov/school-nutrition/training/webcasts#lunch>; <http://dpi.wi.gov/school-nutrition/training/webcasts#ovs>). Please submit details regarding when and where the training was held, who attended, and how the training was conducted.

- ❑ **Finding 20:** The sandwich recipes used contained errors.

- Monday 12.03.18 – turkey and cheese K-5 recipe

- Ingredients – 150 oz sliced turkey white meat, GFS# 282823
- Directions – step #2 place 3 oz of turkey on top of cheese slice

Child Nutrition (CN) label provided states that 3.93 oz (seven 0.57 oz slices) provides 2 oz eq meat/meat alternate. Recipe should clearly indicate how many slices to use in the ingredient list or describe how to properly weigh the turkey to get 3 oz of product in the directions for the sandwiches.

- Step #3 directs the sandwich maker:

- “Hold at 140 degrees or lower until ready to serve.”

Cold time/temperature control for safety (TCS) food, like sandwiches, must be kept at an internal temperature of 41 degrees or lower to prevent rapid bacteria growth.

- Friday 12.07.18 – ham and cheese K-5 recipe

- Ingredients – 150 oz sliced turkey white meat, GFS#643572
- Directions – step #2 place 3 oz of turkey on top of cheese slice

Documentation provided (USDA Foods Product Information Sheet #100126) states that 1.63 oz provides 1 oz eq meat/meat alternate. Recipe should clearly indicate how many slices to use in the ingredient list or describe how to properly weigh the turkey to get 3 oz of product in the directions for the sandwiches.

- Step #3 directs the sandwich maker:

- “Hold at 140 degrees or lower until ready to serve.”

Cold time/temperature control for safety (TCS) food, like sandwiches, must be kept at an internal temperature of 41 degrees or lower to prevent rapid bacteria growth.

Corrective Action: Please provide the PHN with an updated recipe for each sandwich, documentation for the ham offered on Friday’s ham and cheese sandwich, and a corrected CCP statement on each recipe.

- ❑ **Finding 21:** The milk recipe currently being used states “Hold milk below 140 degrees.” Cold time/temperature control for safety (TCS) food, like milk, must be kept at an internal temperature of 41 degrees or lower to prevent rapid bacteria growth. Additionally, milk usage is not recorded on the production records. Production records are the SFA’s way of proving that reimbursable meals were served; therefore, all items offered as part of the reimbursable meal must be recorded. There was a milk recipe on file, however total milks served each day must be recorded (but counts by each milk by type do not need to be recorded).

Corrective Action Needed: Please send the PHN an updated milk recipe with a correct CCP statement. Please submit one week of production records showing the leftover number of milks served each day.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance:

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. This will aid the school in calculating its “yearly” reference period for non-program food compliance which is highly recommended. 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>).
- 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 costing over \$5000 per unit. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other.”
 - Under “Purchases Services” report any time someone is paid for services provided such as equipment repair and health inspections.
 - Under “non-program 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, and caterings would also be included here.

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) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- The unpaid charge policy lacks detail and specificity, particularly regarding the alternative meal procedure utilized in the SFA. The policy should clearly and thoroughly communicate the expectations and procedures for negative meal balances so that families are aware of the implications of unpaid balances. The policy should be revised prior to the start of the next school year to ensure it reflects actual practices in the SFA. The [USDA Overcoming the Unpaid Meal Challenge](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) resource can be a helpful tool when modifying the policy and assessing practices for unpaid meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- **Finding 22:** The annual financial report (AFR) did not have labor, equipment, purchased services, or other expenses reported as non-program foods expenditures. All costs associated with non-program foods must be allocated appropriately on the AFR to represent the full cost of these items. The food expenditures reported for the Special Milk Program (SMP) appear to be excessively high for the scale of the program. It appears that all milk purchased across the district for all programs was reported as an SMP expense. Only the expenses for the milk served in the SMP should be

reported as an SMP food expenditure. The total expenditures reported in the “Grand Totals” section of the AFR does not match the PI-1505 report, and thus the ending fund balances also do not match.

Corrective Action: Correct the AFR to resolve the errors described. This must be done by contacting Jacque Jordee at jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update. Notify the consultant when the report has been resubmitted with the necessary corrections.

- ❑ **Finding 23:** The unpaid meal charge policy was not distributed in writing (letter, handbook, registration materials, etc.) to all households at the start of the school year and to households transferring into the district during the school year. Please note that posting the policy on the district website is encouraged, but does not meet the policy distribution requirement.

Corrective Action: Submit a detailed plan describing how the policy will be distributed to all households in writing going forward.

- ❑ **Finding 24:** Alternate meals are given free of charge to elementary students when the specified negative balance threshold is reached. These alternate meals are not currently being tracked when they are served. Fund 50 may not cover the cost of providing these alternate meals free of charge.

Corrective Action: Develop and implement a process at the elementary schools for tracking the number of alternate meals served. Monthly or annually a transfer must be made from a non-federal funding source into Fund 50 to cover the cost of serving the alternate meals free of charge. Submit a detailed description of the tracking and fund transfer process for the alternate meals that will be used going forward.

Revenue from Non-Program Foods

Technical Assistance:

Non-Program Food Revenue Requirements

- Non-program foods include: adult meals, a la carte, extra entrees, extra milk (for cold lunch or milk purchased at milk break), vended meals (meals sold to other agencies), catering, and food service operated vending machines. Since non-program foods include adult meals and extra milk, these expenses and revenues must be separated from program foods.
- 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. Non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Non-program food costs and revenues must be separated from program food costs and revenues.
- The USDA Non-Program Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on the 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.xlsx>).

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

Findings and Corrective Action Needed: Non-Program Foods Revenue

- ❑ **Finding 25:** The [Non-program Foods Revenue Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) has not been completed for the current school year to assess compliance with the revenue requirements (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

Corrective Action: Complete and submit a completed tool using at least a 5-day reference period. After tool completion and submission, the SFA and consultant must collaborate on any suggested changes to non-program food procedures and pricing to ensure compliance, if the completed tool indicates non-compliance with requirements. The SFA must develop a plan to meet non-program food revenue requirements if the completed tool indicates non-compliance.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

Non-Discrimination 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>). The statement is not currently posted on the school food service website and should be added.
- 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.

Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- 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 of the state agency within 5 days. This should be 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. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. 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](https://fns-prod.azureedge.net/sites/default/files/113-1.pdf) resource (<https://fns-prod.azureedge.net/sites/default/files/113-1.pdf>).

Public Release

- While Omro School District met the public release distribution requirements by sending the public release to at least one media outlet and grassroots organization, the SFA did not retain documentation that this distribution occurred. Annually, the SFA should retain documentation that indicates to whom the public release was sent and on what date. This could simply be in the form of an email communication between the appropriate school staff member and a representative from the media or grassroots organization. As a reminder, SFAs are required to send the public release to a media outlet (such as a local newspaper), but are not required to pay to have it published. Please begin retaining documentation regarding the distribution of the public release.

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.

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>).
- If accommodations will be made in the future based on signed medical statements, the food service director should receive and retain copies of the signed statements submitted by the household. It is crucial that the food service director be able to easily access the exact accommodation request so that it can be implemented correctly and safely according to the medical practitioner's directions.
- 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 or water may not be substituted for fluid milk unless juice or water is specified as a substitution on a medical statement signed by a licensed medical practitioner. An SFA may choose to offer lactose-free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA without a medical statement. 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 the Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- 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>).

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding 26:** The teachers and aides at Patch Elementary that are responsible for checking reimbursable meals at the end of the salad bar have not completed civil rights training. Because these aides are involved in the meal program in this manner, civil rights training is needed.

Corrective Action: Please have these aides complete [civil rights training](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>). Submit a sign-off roster that indicates that the training has been completed for all aides with this salad bar duty.

Local Wellness Policy (LWP)

Technical Assistance:

Documentation

- Documentation pertaining to the LWP should be kept on file in the SFA to show that requirements are being met. This includes a roster of stakeholders involved in the LWP development/implementation/revision, records of when and how the policy is revised, where the policy is available publicly, how potential stakeholders are notified of their ability to participate in the LWP, and any information pertaining to the assessment of the policy.

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness policy (LWP) requirements. At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
 - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
 - Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
 - Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
 - Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
 - Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
 - Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
 - Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Triennial Assessment

- 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>).
- 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.

- Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding 27:** The local wellness policy (LWP) does not contain required language pertaining to policy leadership, public involvement, food/beverage marketing, the triennial assessment, or updating/informing the public.

Correction Action: Submit a timeline for updating the policy to become compliant with the final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule.

Smart Snacks in Schools

Technical Assistance:

- At the time of the on-site review there were no competitive foods or beverages sold at Patch Elementary School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school in Omro School District should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. Fundraiser tracking tools can be found on the [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>)
-

Professional Standards

Technical Assistance:

Employee Designation

- On the off-site questionnaire, there was some confusion regarding which staff members are considered "managers" vs "full time staff members." When a food service director designates staff members as "managers," then the managers are required to complete 10 hours of professional standards training annually. It was determined that the head cooks that were counted as "managers" should actually be considered full time nutrition staff and should complete six hours of training annually. Please reference question 29 of the [USDA Professional Standards Q & A](#) for information regarding manager designation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-38-2016.pdf>).
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Food Safety

Technical Assistance:

Food Safety Plans

- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain

standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria including on field trips.

- It is encouraged that the food service director continue modifying and updating the SOPs in the food safety plan as processes change and as the SOPs can be made more specific to actual practices occurring in the operation.

Findings and Corrective Action Needed: Food Safety

- ❑ **Finding 28:** Reimbursable field trip meals are offered, however there was not a corresponding standard operating procedure (SOP) in the school's food safety plan detailing the food safety practices for field trip meals.

Correction Action: Submit an SOP for field trip meals to reflect site-specific procedures including food handling, storing, transporting, and the leftover food procedure. A [template field trip SOP](#) which can be modified to be site-specific is available on the [food safety webpage](#) (<https://dpi.wi.gov/school-nutrition/food-safety#templates>). The SOP should be added to food safety plan at any schools where field trip meals are offered.

- ❑ **Finding 29:** Food service staff members do not have signed [Employee Health Reporting Agreements](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>). These forms can be found on the [DPI SNT Food Safety](#) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

Corrective Action: Obtain signed agreements for all food service staff members in the district. Scan and send copies of the signed forms to the consultant.

- ❑ **Finding 30:** At Patch Elementary, monitoring logs are not kept for the two milk coolers or the dishmachine. These monitoring logs are required, as described in the site's food safety plan, and serve to document that food safety critical control points are met on daily basis.

Corrective Action: Immediately begin utilizing daily monitoring logs for both milk coolers and the dishmachine at Patch Elementary. Submit one month of completed logs to the consultant.

Buy American

Technical Assistance:

- The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product. A "Domestic Commodity or Product" is defined as an agricultural commodity or product that is produced or processed in the United States using substantial agricultural commodities that are produced in the United States (products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States).
- For domestic products without country of origin labeling (COOL), consider the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the [Buy American Provision webpage](#) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- Before the Procurement Review (PR) was created, the Administrative Review (AR) contained a list of questions intended to assess if a school incorporated adequate competition when awarding

contracts that were funded through tax-payer dollars. It was later determined by the USDA that a more in-depth look at this process should be implemented in order to effectively determine if adequate competition existed. This resulted in the development of the PR. Subsequently, the AR and the PR are completely separate reviews and follow completely separate review cycles. A PR form can be downloaded from the [Procurement Review](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/review-process) webpage (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/review-process). This PR Form is the primary way of obtaining the appropriate information and documentation needed to complete the PR.

- More specific questions regarding the PR, or clarification on parts of the Procurement Review Form can be directed to [Alex Zitske](mailto:alex.zitske@dpi.wi.gov) directly (alex.zitske@dpi.wi.gov).
- The following information must be recorded on a Buy American Non-Compliant Product List:
 1. Date
 2. Name of product
 3. Country of origin
 4. Reason
 - a. Cost analysis
 - b. Seasonality – record the months that the domestic product is not available
 - c. Availability
 - d. Substitution – record the reason the distributor substituted the product
 - e. Distribution – record the reason the distributor carries the non-domestic product
 - f. Other - explain

Additional beneficial information can also be recorded. A suggested [Buy American - Noncompliant Product List template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) can be found on the Buy American webpage, under Buy American Resources (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).

Findings and Corrective Action Needed: Buy American

- ❑ **Finding 31:** Documentation is not currently being kept pertaining to products that are non-compliant with the Buy American provisions.

Corrective Action: Please create or use the template found on the DPI Procurement page to establish a record of products currently received that are not compliant. Please complete one form for each of the products listed below and send to the PHN:

- Trio Gravy – product of Canada
- Sliced Bread – No country of origin

Summer Food Service Program (SFSP) Outreach

Technical Assistance:

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Omro School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months, per 7 CFR 210.12 and 210.18.
- SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

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

Findings and Corrective Action Needed: SFSP Outreach

- ❑ **Finding 32:** The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP), as required per 7 CFR 210.12 and 210.18.

Corrective Action: Submit a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please be specific and include details regarding the method of communication and timeframe for distributing SFSP outreach materials.

Special Milk Program (SMP)

Findings and Corrective Action Needed: SMP

- ❑ **Finding 33:** The counting procedures used to compile the Special Milk Program (SMP) claim are not based on daily point of service (POS) counts. The early childhood counting procedure of recording the number of half pints of milk served daily on a calendar after service is completed is acceptable. However, 4K counts are based on a monthly calculation of 8 oz servings of milk using the number of gallons ordered from the vendor for the month. Claims must be based on daily POS data and cannot be calculated simply based on the amount of milk ordered. There is no POS procedure in place to track the amount of milk served daily to the 4K children. Because a reliable POS process is not in place across the SMP program, a recalculation of the SMP counting and claiming is warranted.

Corrective Action: Develop and implement a process in which 4K teachers/aides track daily the amount of milk served to students through SMP. Milk must be claimed in 8 oz portions, but can be served from a gallon. The amount of fluid milk served from the gallon/pitcher daily should be recorded and then can be converted into 8 oz portions for claiming purposes. Please see the [POS template for Tracking Daily Totals by Pints or Gallons](#) on the Special Milk page of the Milk Programs webpage, as this could be a useful tool in completing the corrective action (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/smp-pos-tracking-pints-gallons.doc>). After the new process has been fully implemented, submit daily SMP milk counts for 30 consecutive school days. While modifications to the POS for the early childhood classroom is not needed, the 30 days of “clean” counts should include counts across the entire SMP—including both 4K and early childhood counts. ***The submitted data will be used to assess fiscal action for the program.***

- ❑ **Finding 34:** The cost per half pint of milk reported on the monthly Special Milk Program claim is the USDA reimbursement rate. The cost reported must be the actual weighted average cost per half pint the SFA pays for the milk based on invoices. USDA provides reimbursement based on the established annual reimbursement rate or the actual weighted average cost per half pint of milk reported by the SFA – whichever is lower.

Corrective Action: Immediately begin calculating and reporting the weighted average cost per half pint of milk on the monthly claims. Simply entering in the USDA reimbursement rate is not acceptable. Submit documentation showing the calculation for the weighted average cost per half pint that will be reported on the January 2019 SMP claim. Notify the consultant when the January 2019 SMP claim is

submitted so that the calculation can be cross-checked with the cost reported on the claim. Please reference the Counting and Claiming section of the [SMP webpage](https://dpi.wi.gov/smp) for more details on this calculation (<https://dpi.wi.gov/school-nutrition/milk-programs/special-milk>).

The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

