

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

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**School Food Authority: Immanuel Lutheran School**

**Agency Code: 717160**

**School(s) Reviewed: Immanuel Lutheran Grade School**

**Review Date(s): May 8-10, 2018**

**Date of Exit Conference: May 10, 2018**

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, 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, and 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 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Food Service Director for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

#### Commendations/Comments/Technical Assistance/Compliance Reminders

##### Public Release

All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must distribute the Public Release to:

- Local news media
- Grassroots organizations (local organizations providing services to populations in need)
- Major employers contemplating or experiencing large layoffs
- Local Unemployment Office (As applicable)

SFAs are not required to pay to have it published but must maintain documentation of whom the release was sent to along with the specific materials distributed.

**Finding:** On review it was found that the public release was only sent to two grassroots organizations, and the requirement is to make an effort to send to three. Technical Assistance was given to send to a third organization such as library, newsmedia, etc.

**Corrective Action Needed:** Going forward into the 18-19 school year, prior to school starting, the Public Release will be sent to three grassroots organizations, documented and kept on file. No further action required.

##### Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually)

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

#### **Incomplete Applications**

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/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.

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

There were only 5 paper applications. All were reviewed, determined correctly and 0 errors found.

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

**Finding:** The applications were signed on all three lines. The Determining Official also signed as the Confirming Official. That cannot be the same person. The Confirming Official is the person who checks the work of the Determining Official and then signs that it has been determined correctly. The Verifying Official signs after the Verification Process has been done, and has checked that it was verified correctly.

**Corrective Action Needed:** The Food Service Director and Administrative Assistant are to watch the [Free and Reduced Price Meal Eligibility Webcast](https://media.dpi.wi.gov/school-nutrition/getting-started-free_reduced-price-meal-eligibility/story.html) ([https://media.dpi.wi.gov/school-nutrition/getting-started-free\\_reduced-price-meal-eligibility/story.html](https://media.dpi.wi.gov/school-nutrition/getting-started-free_reduced-price-meal-eligibility/story.html)). Submit a statement of a few sentences that explains you understand the reasons why each official has a different role.

#### **Verification**

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

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

The Verification process was done correctly with no errors. There was a non-response from the family. An Adverse Action was sent, and the students were changed to a Paid status.

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

### **CHILD AND ADULT CARE FOOD PROGRAM**

### **Commendations**

FSD has stayed abreast of new CACFP requirements. We applaud your efforts and time spent to serve CACFP-compliant meals to Pre-K students.

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

*During this AR, no corrective action will be issued for CACFP meal pattern findings.*

**Overview:** More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Contact Erin Opgenorth ([erin.opgenorth@dpi.wi.gov](mailto:erin.opgenorth@dpi.wi.gov)) or Tanya Kirtz ([tanya.kirtz@dpi.wi.gov](mailto:tanya.kirtz@dpi.wi.gov)) with any questions.

**Training:** You can register on the [School Nutrition Team Training](https://dpi.wi.gov/school-nutrition/training) webpage for School Nutrition Skills Development Courses for summer 2018 (<https://dpi.wi.gov/school-nutrition/training>). CACFP training courses will take place:

- Thursday, July 12, 1-3pm, Northeast Wisconsin Technical College, Green Bay
- Wednesday, July 18, 1-3pm, GEF3, Madison
- Tuesday, July 31, 1-3pm, Northcentral Technical College, Wausau
- Wednesday, August 15, 8-10am, Wisconsin Indianhead Technical College, Rice Lake
- Tuesday, August 21, 3-5pm, Alverno College, Milwaukee

**Cereals:** Cereals served in the CACFP meal pattern cannot contain more than 6 grams of sugar per dry ounce (28 grams). For a listing of [CACFP-compliant cereals](#) visit the Community Nutrition page on the WI DPI website ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_cereals\\_meet\\_sugar\\_calc.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_cereals_meet_sugar_calc.pdf)). The following cereals in storage were identified as containing more than the allowable sugar limit:

- Honey Nut Cheerios
- Lucky Charms
- Pumpkin Mini Wheats
- Special K Red Berries
- Special K Fruit and Yogurt
- Special K Protein
- Quaker Dinosaur Eggs Oatmeal

**Juice:** Pasteurized full-strength juice may only be used to meet the vegetable or fruit requirement at one meal, including snack, per day. Juice was served at breakfast on 5/9/2018, and again at snack that same day.

**Milk:** Pre-K students must be served 6 fl oz (3/4 cup) of unflavored low-fat or fat-free milk at breakfast. If students selected to take milk on 5/9/2018, they were given 4 fl oz (1/2 cup). Milk must be served in its full component (3/4 cup) at every breakfast.

**Meal Service:** Juice (1/2 cup) or milk (1/2 cup) was offered at breakfast on 5/9/2018. Offer vs. serve cannot be utilized for Pre-K students. Students must be served all required components in their full amount. Meal pattern requirements for breakfast, lunch, and snack, can be found on the [Community Nutrition CACFP](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf) webpage ([https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP\\_childmealpattern.pdf](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf)).

### **MEAL PATTERN AND NUTRITIONAL QUALITY**

### Commendations

Thank you to the FSD for her time and efforts in preparing for this review. We appreciate the documentation received off-site. A variety of fresh, appealing, and colorful fruits and vegetables were served at meals. The FSD is friendly and patient with all student who come through the service line. All meals observed during breakfast and lunch service were compliant and reimbursable. Keep up the good work, Immanuel Lutheran School.

### Comments/Technical Assistance/Compliance Reminders

**Training:** You may check the [School Nutrition Team Training](https://dpi.wi.gov/school-nutrition/training) webpage for training opportunities, course descriptions, and registration information (<https://dpi.wi.gov/school-nutrition/training>). The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer around the state of Wisconsin:

- July 10-12, Northeast Wisconsin Technical College, Green Bay
- July 16-19, GEF3, Madison
- July 31- August 2, Northcentral Technical College, Wausau
- August 14-16, Wisconsin Indianhead Technical College, Rice Lake
- August 21-23, Alverno College, Milwaukee

Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. 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](https://dpi.wi.gov/school-nutrition/directory) can be found on our website ([dpi.wi.gov/school-nutrition/directory](https://dpi.wi.gov/school-nutrition/directory)).

**Extra servings:** Per FSD, when toast is served at breakfast, students may ask for a second piece. This is allowable so long as a second slice of toast is made available to all students participating in the SBP. Students are allowed to take seconds of fruits and vegetables. In any case of seconds being offered, dietary specifications must be considered. All foods served, including seconds, must be recorded on production records.

### Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

#### **Finding #1: Second entrees**

Second portions of entrees cannot be offered free of charge to students. This complicates production planning; increases food costs; appears discriminatory if only offered to the older students; and increases the likelihood meals exceed the dietary specifications (calories, saturated fat, trans fat, and sodium).

**Corrective Action Needed for Finding #1:** Submit a statement declaring that second entrees will no longer be offered free of charge to students. *Corrected on site, no further action required.*

#### **Finding #2: Signage**

Lunch signage posted is adequate. Breakfast signage was posted, but not filled in with the daily menu. Breakfast signage needs to specify the number of food items that each menu item was planned for, as well as the number of items from each component that students could select. It is up to the menu planner to determine in advance whether items crediting as 2.0 ounce equivalents (oz. eq.) count as one or two food items. She must clearly communicate to students what foods they can (must) select in order to have three food items for a reimbursable breakfast. For example, the pancakes served on the day of observation were 2.0 oz eq, so they could be counted as either one or two items.

**Corrective Action Needed for Finding #2:** Technical assistance was provided and FSD filled in the signage with today's menu and the correct number of items. *Corrected on site, no further action required.*

**☒ Finding #3: Whole-grain rich items**

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. A partial loaf of non-WGR bread was found in storage. Non-WGR bread is not planned on the menu, nor was it served during the week of review.

**Corrective Action Needed for Finding #3:** *FSD discarded the partial-loaf of non-WGR bread. Corrected on site, no further action required.*

**☐ Finding #4: Production Records**

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. The following was not thoroughly recorded for both Pre-K and K-8 at lunch and breakfast for the week of review:

- planned serving sizes
- substitutions made (eg, vegetarian meals)
- actual quantity prepared in purchase units
- leftovers

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>). A copy of the production record requirements ("Must Haves and Nice to Haves" list) can also be found at that link. It is recommended that Immanuel Lutheran adapt the [two grade group production record template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-lunch-two-grade-groups.doc) for Pre-K and K-8 students (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-lunch-two-grade-groups.doc>).

**Corrective Action Needed for Finding #4:** Submit completed breakfast and lunch production records for Pre-K and K-8 for one five-day week.

**☐ Finding #5: Standardized recipes**

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 foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Even though USDA calls some recipes "standardized recipes," they are in fact quantity recipes. These recipes will only be standardized once they have been tried, tested, and adapted to your food service operation.

Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

**Corrective Action Needed for Finding #5:** Submit standardized recipes for:

- Roll (include type of flour used in facility)
- Grilled cheese sandwich (include type of bread and cheese used in facility)

- Pizza crust (include type of flour used in facility)
- Cheese pizza
- Scrambled eggs (include type of egg used in facility)

**☐ Finding #6: Offer versus Serve**

It is important for all staff and students involved with meal service to fully understand the OVS requirements to ensure students are selecting reimbursable meals. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) is available on our website (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf).

**Corrective Action Needed for Finding #6:** Conduct or view OVS training for all food service staff, such as the [OVS webinar](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story\_html5.html). Provide documentation of all food service staff (including teachers or students who assist with meal service) attendance at this OVS training. If unable to complete this training before the end of the 2017-2018 school year, please submit a written plan of action explaining how this training will be conducted prior to the 2018-2019 school year.

**☒ Finding #7: Alternate options**

FSD states that on rare occasions, one student will refuse the M/MA entrée, and will be provided with 4 oz yogurt (1 oz eq M/MA). A different student will occasionally refuse the M/MA and grain entrée, and will be provided with 4 oz yogurt (1 oz M/MA) and 1 oz eq Goldfish Giant Graham. This is not a planned or advertised alternate meal.

This practice is unfair to other students who may prefer, but not be offered, the alternate yogurt meal. This has the potential to become a Civil Rights complaint. Additionally, alternate meals need to be assessed to meet daily and weekly meal pattern requirements. These alternate meals would not meet weekly K-8 meal pattern compliance if they were to be offered daily. If a child refuses to take a component or entrée, it is up to the FSD to encourage the student to select a reimbursable meal using Offer vs. Serve and decline the components they do not care for. All offerings must be recorded in production records.

**Corrective Action Needed for Finding #7:** Discontinue this practice. Alternatively, offer an alternate meal to all students that meets daily and weekly meal pattern requirements and is documented in production records (to be reviewed upon submittal). Submit a written statement outlining the action that will be taken moving forward. *FSD discontinued practice. Corrected on site, no further action required.*

*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 and School Breakfast 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.*

**BUY AMERICAN**

Comments/Technical Assistance/Compliance Reminders

The USDA requires that an 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. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

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

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

#### **Finding #1: Non-compliant items**

The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Bananas- Guatemala

**Corrective Action Needed for Finding #1:** Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A template form is located on the [procurement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>). *Corrected on site, no further action required.*

### **3. RESOURCE MANAGEMENT**

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

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

- How to locate the agency’s Child Nutrition program Report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, was reviewed with . We also reviewed how to access the Aids Register, to track all program deposits made to the agency’s account. The Aids Register also shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. Both resources are accessible from our [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage ([dpi.wi.gov/nutrition/online-services](http://dpi.wi.gov/nutrition/online-services)).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

##### **Annual Financial Report (AFR):**

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student.



The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
  - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
  - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
  - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

#### Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

#### Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot 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>).

## Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding:** The Annual Contract had some incorrect information regarding Officials.

**Corrective Action Needed:** The Annual Contract was updated and Officials Information page was changed to reflect correct information for each official designated. The email address was changed for the food service director due to inconsistencies in receiving information from DPI addressing the National School Lunch Program. These changes were made onsite, the contract was updated with the Food Service Director present and submitted for the 18-19 school. No further action needed.

## Paid Lunch Equity

### Commendations/Comments/Technical Assistance/Compliance Reminders

The school chooses not to do the PLE tool for the 18-19 school year. Their pricing is going to remain the same as the 17-18 school year. The PLE survey was completed.

## Revenue from Nonprogram Foods

### Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

$$\frac{\textit{Nonprogram food revenue}}{\textit{Total program and nonprogram revenue}} > \frac{\textit{Total nonprogram food costs}}{\textit{Total program and nonprogram food costs}}$$

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

## Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing->

guide.doc).

- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.

#### 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)

#### Indirect Costs

##### Commendations/Comments/Technical Assistance/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
  - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
  - Utility charges - separately metered or current usage study by the local utility company.
  - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
  - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume.
  - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district’s total.

#### **4. GENERAL PROGRAM COMPLIANCE**

##### Civil Rights

##### Commendations/Comments/Technical Assistance/Compliance Reminders

###### Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 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, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

###### And Justice for All Poster

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

### 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.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

### Civil Rights Self-Compliance Form

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

### Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- 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, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide the nutrition information from the product you will be using. For more information on [fluid milk substitutes](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow's milk and pre-approved through DPI. Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP, which allows juice as a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use.

### Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. There is no overt identification during meal services.

❑ **Finding:** The POS system currently used is one of which a forecast list from the morning is being utilized where the staff person checks off the student if they don't eat a meal.

**Corrective Action Required:** Discontinue this practice, as it is not a clean POS system. The staff person at the end of the line should place a check mark by each students name when a reimbursable meal has been taken. This roster should then be submitted to the Food Service Director daily.

It is noted in the Public Health section Finding #6, of this report for all students and staff helping with meal service to watch Offer vs Serve Webcast. The POS system was changed on-site, no further action needed from NPC. Corrective Action is required in the PHN section above including the link to Offer vs Serve.

#### 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 within 3 days. You will want to make 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. 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 Complain 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).

❑ **Finding:** It was observed that the "Justice for All" poster was not outside of the kitchen in public view.

**Corrective Action Needed:** Place the poster in a place where the public can view at any time, such as the lobby, cafeteria, etc. This was done onsite, no further action needed.

#### On-site Monitoring

#### Commendations/Comments/Technical Assistance/Compliance Reminders

On-Site Monitoring is being done according to the USDA regulations.

#### Local Wellness Policy

#### Commendations/Comments/Technical Assistance/Compliance Reminders

#### 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 (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit). 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).

Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies ([http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

**SFA is required to make the Local Wellness Policy available to the public and public must be informed of updates to policy (1001)**

**Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform the public about the content, implementation of, and updates to the LWP annually. Your SFA did not notify the public regarding updates to the LWP. SFAs may use a variety of methods to notify the public about the LWP and its updates. This may include mailing flyers, newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification.

**SFA is required to review and update Local Wellness Policy (1002)**

**Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. Your SFA has not reviewed nor updated your policy within the past three years. Additionally, your SFA does not have documentation indicating when and how the plan is/will be reviewed and updated.

**SFA is required to have a committee of diverse stakeholders and/or a roster of those involved (1003)**

**Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. SFA wellness committees should include a diverse team of committed school and community stakeholders. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.

#### **SFA is required to inform potential stakeholders of their ability to participate in the Local Wellness Policy (1004)**

**Technical Assistance:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>).

#### **SFA is required to complete an assessment of the Local Wellness Policy (1005)**

**Technical Assistance:** 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 your 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 schools 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](http://wellsat.org/)) for assistance in assessing the LWP (<http://wellsat.org/>).

#### **SFA required to inform the public of the results of the most recent assessment (1006)**

**Technical Assistance for 1006, if do not have a policy:** The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. Following the assessment 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. 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. It is recommended SFAs include a plan to improve upon the results of the assessment.

### **Findings and Corrective Action Needed: Local Wellness Policy**

**□ Finding:** The current wellness policy does not specify some required components of the LWP to include: policy leadership, public involvement, foods provided but not sold, food and beverage marketing, goals for nutrition education, and nutrition promotion.

**Corrective Action Needed:** Review your policy, and add language to fulfill these requirements. Use the checklist with the link provided here to assist you. You may copy and paste language from the checklist into your policy to make it site specific.

Please provide a timeline for updating your policy to become compliant with the final rule. Utilize the [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>).

## **SMART SNACKS**

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

At the time of the on-site review there were no competitive foods or beverages sold. 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.

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new "Smart Snacks" regulation that is effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage at (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

## **Professional Standards**

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

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program "director". A program "director" is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.



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

### **Professional Standards: Training Requirements**

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).
- **Annual Training Requirements for All Staff**  
 Directors: 12 hours  
 Managers: 10 hours  
 Other Staff (20 hours or more per week): 6 hours  
 Part Time Staff (under 20 hours per week): 4 hours  
 If hired January 1 or later, only half of the training hours are required during the first school year of employment.

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

**Finding:** Training is not being monitored on a tracking tool.

**Corrective Action Needed:** Use the DPI Tracking Tool (link posted above) to include all current training hours for each food service employee and submit copy as part of corrective action. Continue to track all training hours to comply with the requirements of Professional Standards.

### **Water**

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

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

Water is available to all students during meal service.

### **Food Safety and Buy American**

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

[A Flash of Food Safety](http://www.fns.usda.gov/ofs/food-safety-flashes) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). While you're at it, visit the

[Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

### **Food Safety Inspections**

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

### **Food Employee Reporting Agreements**

- All food handlers must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- All food handlers must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

### **Findings and Corrective Action Needed: Food Safety and Buy American**

**❑ Finding:** Missing Food Employee Reporting Agreements

**Corrective Action Needed:** Complete all missing agreements. Submit copies of completed agreements as an attachment to assigned DPI Nutrition Program Consultant via email.

### **Reporting and Recordkeeping**

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.
- Keep all records for 3 yrs plus the current year.

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

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

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

### **Breakfast Promotion**

The breakfast participation is lower compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the

[Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

### 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 Immanuel Lutheran, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. 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>)

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

### **Findings and Corrective Action Needed: SFSP and SBP Outreach**

Technical Assistance was provided to look on the DPI website and find where information is stored regarding Summer Feeding and Outreach. The Wisconsin Map was accessed and a location was found where Immanuel Lutheran families can go for summer meals if needed.

❑ **Finding:** No Summer Outreach is being done currently.

**Corrective Action Needed:** The information for Summer Outreach and locations for Summer Meals was found and printed, and will be going home in the “end of year” newsletter. At the time of review, school will be ending within two weeks. Corrected on site, no further action needed.

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Afterschool Snack Program**

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

- Each site participating in the Afterschool Snack Program needs to receive a review within the first four weeks of operation, and a second review within the school year. The review form may be found on our [Afterschool Snack Program](http://dpi.wi.gov/school-nutrition/after-school) webpage (<http://dpi.wi.gov/school-nutrition/after-school>).
- After School Snack is being done correctly and efficiently.

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 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>).

