

**Administrative Review Summary Report
Technical Assistance and Corrective Action Plan**

Agency Code: 09-1204

School Food Authority: Cornell Area School District

School(s) Reviewed: Cornell Middle School

Review Date(s): November 29-30, 2016

Date of Exit Conference: December 1, 2016

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 School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations which may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrative corrective action was completed are specified.

Appreciation/Commendation

Thank you for the warm welcome to the Cornell Area School District. You are doing a terrific job maintaining a clean, organized kitchen and serving healthy, nutritious meals to students. Thank you for sending all documentation in an organized manner for the week of review and the days of the onsite review. I appreciate your communication and responsiveness to e-mails and answering any questions I had. This review has truly been a breeze! It is apparent you and the rest of your staff take pride in what you do at Cornell Middle and High School and it is greatly appreciated.

Thank you for the courtesies extended to us during the on-site review. It was helpful to have all of the requested documentation pulled, organized, and ready for the review. We appreciated all the work done prior to the review in completing the Off-site Assessment Tool. Everyone was very easy to work with and willing to make changes if necessary. We hope you found the time spent in providing technical assistance during the on-site review helpful.

All of the meals observed were reimbursable with the exception of four meals which did not have a full ½ cup fruit/vegetable. These students did take one package of baby carrots which credited as ¼ cup vegetable. Technical assistance was provided for the crediting of these pre-packaged carrots.

The 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, menu planning, financial management, professional standards, procurement and many other topics. More information can be found on our training page, along with other upcoming trainings and webinars at: <http://dpi.wi.gov/school-nutrition/training>.

Consider pursuing a Goal Oriented Achievement Learning Skills (GOALS) Certification. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration, operations, communications, and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>.

School districts are required to have a local meal charging policy in place no later than July 1, 2017. More information, resources and best practices may be found on the SNT website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision in which every student will graduate prepared for college and career ready in an initiative called "Agenda 2017". His

goals are for students to have the knowledge, skills, and habits which will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits/skills.

The School Nutrition Team believes what school nutrition programs do every day plays a very important part in the success of every child being able to graduate and be career ready. We all know 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 <http://dpi.wi.gov/statesupt/agenda-2017>.

**Meal Access and Reimbursement:
Certification and Benefit Issuance, Verification, Meal Counting and Claiming**

Certification and Benefit Issuance

Two hundred and forty-five eligibility determinations were reviewed, and *No Errors* were identified. Congratulations for the great job you are doing!

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.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, you should not convert it to annual amount. Using the Income Eligibility Guidelines (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility-guidelines-1617.doc>) you would look at the amount of their income under the column indicating the frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- 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. There are no negative numbers recognized in USDA Child Nutrition Programs.
- When benefit's eligibility status increases, the change must take place within 3 days. When benefit's eligibility decreases, the change cannot take place before 10 calendar days. A notice of adverse action must be sent in writing with appeal rights procedures which starts the ten day clock.

Zero Income

- Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

Household Size Box

- If the Total Household Members box on an application has been completed, but the number of children and adults listed on the application add up to a different number, the school district is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.
- If the Total Household Members box has not been completed, the school district is required to follow up with the household to confirm the total number of household members. It cannot be assumed the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional office, any application which does not have this box completed is considered an incomplete application.

Incomplete Applications

- Any application which is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The school district may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including e-mail. The determining official should document the details of the conversation, 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.

Annual Income

- If the household provided only annual income, the Determining Official must follow up with the household to ensure the amount is an accurate reflection of the household's current income.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the Determining Official must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Application forms

- If a school district wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, these documents need to be approved by the School Nutrition Team.

Effective Date of Eligibility

- District may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is received. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The School Nutrition Team (SNT) must be contacted prior to implementing this flexibility for approval.

Direct Certification

- As a reminder, you are required to run Direct Certification (DC) a minimum of three times a year: at or near the beginning of the school year, three months after the initial run (approx. November) and six months after the initial run (approx. February).
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Please note that a direct certification run cannot be done specifically for students in parochial schools to identify free eligible for other funding sources (i.e., Title 1). DC runs are only for school nutrition and it is not allowable to be running it for other schools outside of your district or for purposes other than school nutrition programs.

Disclosure

- The information provided by families on the free and reduced price application is to be used only for determining eligibility for meals or milk benefits.
- The School District must seek written consent from the parent or guardian to use the information provided on the application or through DC for non-program purposes, such as athletics or testing fee waivers. Consent must be obtained each school year. A template sharing information form is located on the SNT webpage <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc>.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the school district. A template disclosure form is located on the SNT website here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.

Verification

- When applications are chosen for verification, the person designated as the Confirming Official should be reviewing these applications prior to contacting the household to ensure the initial determination is correct. There is a place for the Confirming Official to sign and date on the back of the application.
- The School District has a regulatory obligation to verify "for cause" all approved applications which may be questionable. For more information, refer to the current Eligibility Manual.

Meal Counting and Claiming

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- Before entering a claim for reimbursement it is necessary to conduct an edit check to calculate your reimbursable meals by site before consolidation.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and the student will be charged for the milk as an a la carte item.

Meal Pattern and Nutritional Quality:

Meal Components and Quantities, Offer versus Serve, Dietary Specifications, Nutrient Analysis

Meal Components and Crediting Documentation:

- As a reminder, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food or meat/meat alternate or other processed food not found in the USDA *Food Buying Guide* for Child Nutrition Programs. Please keep updated copies of CN labels on file. It is important that CN labels are taken directly from the box. They can be kept in original format or photocopied as a clear, legible photocopy with the entire label visible. When CN labels are not available for products, those products must have a current, accurate PFS detailing product composition and crediting information in order to be served in Child Nutrition Programs. More information regarding crediting documentation can be found at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>.
 - **Grain Crediting:** Exhibit A in the Food Buying Guide to credit grain items can be found here: http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf.
 - **Training:** Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Please stay tuned on our webpage for current and upcoming opportunities <http://dpi.wi.gov/school-nutrition/training>. Please also know all members on the School Nutrition Team are available for technical assistance any time throughout the year. A current staff directory can be found on our website: <http://dpi.wi.gov/school-nutrition/directory>.

Technical Assistance

- **Baby Carrots:** The 1.6oz packet of baby carrots is listed on the production records as crediting 1/8 cup. When using the Food Buying Guide (FBG), these can be credited as ¼ cup.
- See math below:

Carrots, fresh <i>Baby Ready-to-use</i>	Pound	12.90	1/4 cup raw vegetable	7.8	1 lb AP= 1 lb (about 3-1/8 cups) ready-to-serve raw carrots
	Pound	11.40	1/4 cup cooked, drained vegetable	8.8	1 lb AP= 0.97 lb (about 2-3/4 cups) cooked carrots

12.90, ¼ cups in a pound of baby carrots (see circle above). This is equivalent to 3.225 cups in a pound (12.90 x 0.25 = 3.225). Therefore,

$$\frac{3.225 \text{ cups}}{16 \text{ oz.}} = \frac{X}{1.6 \text{ oz.}} \quad \text{Solving for } X = 0.3225 \text{ cups} = \frac{1}{4} \text{ cup carrots in a 1.6 oz. bag}$$

Offer versus Serve

- Cashiers are trained on the required meal components and the Offer vs. Serve concept. Please document those staff members' training for Professional Standards.

Dietary Specifications and Nutrient Analysis

- A nutrient analysis was not required to be completed

Resource Management:
**Risk Assessment and Comprehensive Review of Nonprofit School Food Service Account,
Paid Lunch Equity, Revenue from Non-program Foods, and Indirect Costs**

Risk Assessment for Resource Management

- There are no findings in this area of the review.

Comprehensive Review

- There are no findings in this area of the review.

Paid Lunch Equity

- The Paid Lunch Equity tool must be completed yearly and prices raised accordingly with a maximum yearly increase of \$0.10 as required by regulation.
- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

Nonprofit School Food Service Account

- School districts must limit the net cash resources in order to not exceed three months average expenditures.

Annual Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other sources of revenue need to be entered into the program to which they belong. This will aid the school district in calculating its “yearly” reference period for non-program food compliance which is highly recommended. The new 16-17 Annual Financial Report (AFR) instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- 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”.
- Items noted during the review of the AFR should be addressed when tracking revenues and expenditures to 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 more than the school district capital acquisition threshold. 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 provided like 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 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 the USDA Foods. The amount deducted from this 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 Food and Nutrition Services.
- 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 can be found here: <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. SP57-2016 Unpaid Meal Charges guidance Q & A may be found at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.

Revenue from Non-program Foods

- Regulations now require schools to run what is called the Non-Program Foods Revenue Tool which will determine if the school is generating sufficient revenue to cover food costs. Information used to run the tool is taken from the Annual Financial Report. This department strongly recommends schools cover food and labor costs for all Ala Carte activities. The USDA tool is located on our website at http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls.
- Also as a reminder non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals, Catered Meals, and Food Service operated Vending Machines. All non-program food costs including food, labor, equipment, purchased services, and other expenses must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit. There is a calculator located on our website to aid you in calculating the prices of your non-program foods. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/nonprogram-food-price-calculator.xlsx>
- To document non-program food compliance with the Federal regulation, the USDA Non-program Foods Revenue Tool needs to be completed. To do this, the school district must select a reference period of at least 5 consecutive operating days (4 consecutive days for schools which only operate 4 days) of a regular school week, and compare the reference period revenue ratio to the food cost ratio to determine if the revenue ratio is equal to or greater than the food cost ratio. Rather than separating all costs for the entire year (although recommended), school districts must separate their non-program food costs from their program food costs for the selected period to complete the Non-program Foods Revenue Tool. If the revenue ratio is equal to or greater than the food cost ratio, the school district is in compliance.

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

School districts must collect the following information for the reference period

For non-program food revenue, the dollar amount of non-program food sales, including a la carte sales, adult meals, vending machines, and any other non-program food purchased with nonprofit school food service account funds. For total revenue, the dollar amount of program and non-program food sales.

For non-program food cost data, includes

- An itemization of all non-program foods to be offered during the reference period;
- The per item/serving cost of each non-program food, including food sold only as non-program food, food sold as program and non-program food (crossover food);
- The number of servings/items sold.
- For total food cost data, include all non-program food cost data and program food cost data. Program food cost data should be readily available using production records, invoices, etc.

Indirect Costs

- 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 reality 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.

General Program Compliance:

Civil Rights, On-site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in Schools, Professional Standards, Water, Food Safety, Storage and Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach

Civil Rights

- 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 just updated in October 2015 located here: <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,”** so it can be printed in the same size font as the other printing in the document.

And Justice for All Poster

- We appreciated the lunch room area had the food safety inspection and the new “And Justice for All” posters posted on the cafeteria wall so the general public can read the information.

Civil Rights Training

- Civil rights training had been attended by all staff in the schools and documentation was available for review. This training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

Civil Rights Self-Compliance Form

- The Civil Rights Self-Evaluation Compliance form was completed. It is required to be completed by October 31 annually.

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 which 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 this is included in the district procedures to ensure compliance.
- All school districts 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 school district 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 school district must provide them with the information necessary to do so and not impede an individual's right to file.
- The form to assist in filing these complaints can be found on the DPI SNT website at: https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf

Special Dietary Needs

- Special dietary accommodations were discussed. If providing a fluid milk substitute for students who are lactose intolerant, it cannot be juice, unless based on a documented disability by a medical practitioner. Water is available to all students, a lactose free milk could be offered or you can provide a fluid milk substitute which 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 us the nutritional panel 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>.
- All food substitutions for children with disabilities must be documented by a licensed medical professional. We have a prototype Medical Form posted on our website that is also available in Spanish and Hmong you

can use http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special_dietary_requests_form.pdf. When the form is completed indicating the special dietary request is based on a disability, the school is required to provide a meal that meets the child's needs as documented. The meal would not have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child. 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>.

- School food service staff may make food substitutions, at their discretion, for individual children who do not have a disability. The school must still have a completed Dietary Request Form on file from a medical authority (could be a school nurse) certifying the student as having a special medical or dietary need. Such determinations are only made on a case-by-case basis and all accommodations must be made according to the USDA's meal pattern requirements in order to claim the meal.
- 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 does allow juice as a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal. School districts may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use. See SP 07-2010 <http://www.fns.usda.gov/qas-milk-substitution-children-medical-or-special-dietary-needs-non-disability> for more information.

Local Wellness Policy and School Meal Environment

- Under the Healthy Hunger-free Kids Act of 2010, all School Food Authorities are required to have a written Local Wellness Policy (LWP) and have an active Wellness Committee. Information on school wellness policies may be found on our website at <http://dpi.wi.gov/school-nutrition/wellness-policy>.
- School's local wellness policies should include language related to nutrition education, nutrition promotion, nutrition guidelines available for all foods on campus, physical education, and physical activity.
- School districts must inform the public about the content of the school's local wellness policy and retain documentation regarding the notification.
- School districts must review and update local school's local wellness policy on a periodic basis (recommended annually) and retain documentation demonstrating how this requirement is met.
- School districts must permit parents, students, physical education teachers, school health professionals, school administrators, school board representatives of the school district, and the general public to be involved in the development, implementation, periodic review, and update of the school's local wellness policy. School district wellness committees should include a diverse team of committed school and community stakeholders. School districts are required to actively seek members for the wellness committee which represent each of the above categories and retain documentation that all have been notified of participation availability.
- The school district must conduct an assessment of the implementation of school's local wellness policy every 3 years. School districts are required to retain a copy of the assessment on file. The assessment should include the extent to which school districts are in compliance with their school's local wellness policy; the progress made toward attaining the goals of the LWP; and the extent to which the school district's LWP compares to a model policy. *Implementation-Monitoring Plan* template has been developed to assist school districts to assess their LWP progress. This is on page 43 of the *Wisconsin Wellness: Putting Policy into Practice-School Wellness Policy Toolkit* http://fns.dpi.wi.gov/fns_wellnesspolicy2.
- School districts are required to inform and update the public (including parents, students, and others in the community) about the assessment of the implementation of (LWP). School districts are required to retain a copy of the assessment and documentation regarding the public notification.

Smart Snacks in Schools

- 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 which became 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 website 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 which 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 school district wide to assure

compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Professional Standards

- 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 which 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 school district directors are based on the size of their school district and includes education, school nutrition experience, and food safety training requirements which are located here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>.
- Per USDA memo SP 38-2016, any School Food Service Director hired after July 1, 2015 which 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 school district’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.
- Annual training must be job-specific and intended to help employees perform their duties correctly. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Training obtained since April 1, 2015 may count towards these requirements. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house)
- School districts should clearly document all required training information and maintain a file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), and professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Annual Training Requirements for All Staff

If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Directors	Managers (20 hrs. or more/week)	Other Staff (less than 20 hrs./week)	Part Time Staff
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

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.

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 of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site’s Food Safety Plan. These Food Safety Inspection/Reports must be posted where the general public can read it. It was posted next to the ‘Justice for all’ poster in the cafeteria.

Temperatures

- All pieces of cooling equipment must have the internal temperature taken and recorded daily on a temperature log. Having them posted right on the actual piece of equipment makes recording convenient.

Food Safety Plans

- The Food Safety Plan was available for review. All schools must have a comprehensive site-specific food safety plan on site which includes all process 1, 2, and 3 items, all standard operating procedures (SOP) for each individual site, all equipment, and food and be reviewed yearly. Updated prototype food safety plan templates and SOPs may be found at our website under <http://dpi.wi.gov/school-nutrition/food-safety#fsp>.
- School districts are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition programs. This means the food safety program should contain standard operating procedures for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria as applicable. Thank you for maintaining a Food Safety plan with equipment, food processes 1-2-3 and Standard Operating Procedures (SOP).
- All food service employees must have a signed Employee Reporting Agreement on file.

Storage

- School districts are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)). The on-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.

Time as Public Health Control

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

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

Buy American

- The USDA requires school districts purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by school districts or entities that are purchasing on their behalf.

- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures the bidder is responsive and responsible to the solicitation.
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

Reporting and Recordkeeping

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

SBP and SFSP Outreach

- At the beginning of the school year, the school district 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

- Some ideas and more information about potential breakfast service models as well as financial models can be found in the Serving up a Successful School Breakfast Program guide: <http://dpi.wi.gov/school-nutrition/school-breakfast-program>. A Breakfast in the Classroom Toolkit is also available here if that is considered: http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/BIC_Final-web.pdf.
- 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 here: <https://www.youtube.com/watch?v=aHR7eECbKaE>
- For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.
- 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.
- Cycle Menu Resources: <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>

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. USDA would like all school districts to inform families of where their students can receive a free meal in the summer months. School districts can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](#) on the [DPI Summer Meals website](#)
 - 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 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 on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

**Other Federal and State Programs—Afterschool Snacks, Fresh Fruit and Vegetable Program,
Special Milk Program, Wisconsin School Day Milk Program**

Fresh Fruit and Vegetable Program

- As a reminder, nutrition education is essential to the success of the program but additional funding is not available through the grant to purchase nutrition education materials. Free materials can be ordered from the USDA's Team Nutrition order form at <http://tn.ntis.gov>. Other materials can be accessed through the Wisconsin Team Nutrition website at http://ne.dpi.wi.gov/ne_nutred.
- Classroom teachers are allowed to participate with the students in the FFVP snack but that they are the only adults allowed to. Teachers can be powerful role models for students. While eating the FFVP snack with students, teachers have the opportunity to model healthy eating behaviors. This can be an effective way to reinforce nutrition education lessons and encourage reluctant students to try the snack. However, teachers are not required to participate and no additional funding is provided in the grant for teachers. If a classroom has both a teacher and a teacher's aide, the teacher's aide can be permitted to participate in the FFVP snack in place of the teacher if they have direct involvement with the students. See page 10 of the FFVP handbook for more information at: <http://www.fns.usda.gov/sites/default/files/handbook.pdf>
- Offering a cooked vegetable can be allowable if certain criteria are met. This is mentioned on page 15 of the USDA's FFVP Handbook. The vegetable must be purchased fresh and cooked in house. Additional ingredients should not be added during the cooking process as the goal is still to connect students with the flavor of the actual vegetable. The vegetable cooked should be one which is not normally eaten raw and it must be offered as part of a nutrition education lesson. Cooked vegetables are limited to one time per week.

Wisconsin School Day Milk Program

- Wisconsin School Day Milk Program (WSDMP) requires the distribution of free milk to free and reduced priced students in K-5.
- Point of Service Counts (POS) for the Wisconsin School Day Program and the Special Milk Program must be recorded by who "did" take milk not by marking who "did not" take one.
- In the WSDMP Agreement the school district agrees to serve Wisconsin-produced milk (contract number 3). Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid.

Additional Resources

The 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* website. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products. You can access the website and the resources at <http://www.fns.usda.gov/healthierschoolday>.

The Smarter Lunchrooms Movement encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options. 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. Learn more about these effective, research-based strategies at: <http://smarterlunchrooms.org>.

Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk listed at <http://smarterlunchrooms.org/objectives/increasing-number-students-select-white-milk>. See how many of the Smarter Lunchroom techniques are already being used and how many more could be implemented by completing the self-assessment at http://smarterlunchrooms.org/sites/default/files/lunchroom_self-assessmt_score_card.final_4-3-14.pdf.

DPI has posted a Field Trip resource page on our website to help schools offer a meal to students found under NSLP, then meal planning. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/field-trip-meals-templates.doc>

Corrective Actions

Finding:

During lunch Service at the Middle School four meals were observed which did not have a full ½ cup fruit/vegetable. These students did take one package of baby carrots which credited as ¼ cup vegetable. Technical assistance was provided for the crediting of these pre-packaged carrots.

Required Corrective Action:

Provide a written statement on how the cashier will be trained on ½ cup fruit/vegetable portions. This could be in the form of a review of the day's menu and what a ½ cup portion will look like. Fiscal action will be calculated for these non-reimbursable meals claimed. Please submit by January 6, 2017.

Finding:

The assorted cereals sent for the week of review were not all whole grain-rich. Specifically, the Fruit Whirls, Cocoa Munchies, and Bunch O' Crunch were not whole grain-rich. Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning greater than 50% of the product needs to be whole grain. When determining if an item is whole grain-rich, the first word in the ingredient list needs to say *whole* or have a whole grain listed first. The three mentioned do not.

Required Corrective Action:

Please find new, whole grain-rich versions of the following products and submit nutrition facts labels and ingredient lists for: Fruit Whirls, Cocoa Munchies, and Bunch O' Crunch. Teresa sent labels for: whole grain-rich Honey Nut Toasted Oats and whole grain-rich Cinnamon Toasters, which will replace the non-whole grain-rich cereals. She will offer these in conjunction with the Happy Shapes, which were whole grain-rich. The new ones will be in 1 cup servings, which are 1 oz. eq. portions.

No further action is necessary.

Finding:

The printed menu (<http://www.cornell.k12.wi.us/uploads/Lunch/November%202016.pdf>) should list all components included with a reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that states something along the lines of: a variety of milk is offered daily as part of the reimbursable meal. There also was no non-discrimination statement on the menus.

Required Corrective Action:

Please update the menu to include a statement that states a variety of milk is offered daily as part of the reimbursable meal. Also include the non-discrimination statement: This institution is an equal opportunity provider. Please submit updated menus to **Janelle Winter, RDN, CD** via email, mail, or fax by January 6, 2017.

Finding:

Before submitting the claim for reimbursement no edit check was being performed. Infinite Campus does have an edit check report which can be run before submitting the claim. The October Breakfast claim for reimbursement has over claimed 15 reduced and 3 paid breakfasts. Although this was a human error in looking at the wrong row of the monthly transaction report, it may have been discovered if an edit check had been conducted. Regulations 7 CFR 210 require an edit check be conducted before submission of claim.

Required Corrective Action:

Provide a written statement the edit check report will be generated from the lunch program software and reviewed before a claim for reimbursement is submitted. Fiscal action will be calculated for the overpaid meals claimed. Please submit by January 6, 2017.

Finding:

Wisconsin School Day Milk Program (WSDMP) was observed in a third grade class room. The Point Of Service (POS) used was actually an attendance record. Only at the time of milk service can it be recorded a student has received a milk to be claimed in the WSDMP.

Required Corrective Action:

Provide a written statement how the POS will be addressed to insure accurate counts of the milk served before a claim for reimbursement is submitted by January 6, 2017.

As discussed at the exit conference, it is understood that prompt corrective action is required for the findings identified above. Part 210.08 of federal regulations requires fiscal action to be calculated for critical violations to reclaim of unearned reimbursement. In addition, withholding of program payments is required if documentation of corrective action is not received within 30 days of the date negotiated at the exit conference, or as later extended upon written request if extraordinary circumstances delay completion of corrective action within the originally negotiated timeframe. Uncorrected errors are subject to reclaim for the entire school year.

Section 207 of the Healthy Hunger Free Kids Act amended section 22 of the NSLA (42 U.S.C.1769c) to require State agencies to report the final results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. The final rule at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each school district on the State agency's publicly available website, and the school district is strongly encouraged to post a summary on the school districts public website. A summary of this review will be made publicly available on the SNT website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> within 30 days of the school district receiving the final AR report.

_____ Signature of Authorized Representative	<u>12/1/2016</u> Date of Exit	<u>January 6, 2017</u> Negotiated Corrective Action Date
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Signature of Food Service Director

Signature of Nutrition Program Consultant

Signature of Public Health Nutritionist

