

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Lake Holcombe School District Agency Code: 9-2891

School(s) Reviewed: Lake Holcombe High School

Review Date(s): 3/6/18-3/7/18

Date of Exit Conference: 3/7/18

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

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

General Program Reminders/Updates:

GOALS

- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

SOCIAL MEDIA

- Submit photos to the School Nutrition Team to be posted on the DPI SNT Facebook page, Twitter page or Instagram page. Send photos to Dana Colla at dana.colla@dpi.wi.gov.

SNSDC TRAININGS

- The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer in Green Bay, Wausau, Rice Lake, Madison and Milwaukee. There will be emails sent in the coming months regarding the trainings available at these locations. You may also check back on the [School Nutrition Team training website](#).

Appreciation/Commendations:

Thank you to the Bookkeeper, Food Service Manager, and Food Service Staff for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. 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.

Thank you for all that you do to feed the students healthy meals!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Applications were determined in a timely manner. Each application was signed off on and dated by the Determining Official. The official's organization of the requested benefits information made it easy to review.
- Direct Certification is run early and often which is a best practice. Great work!

Technical Assistance/Compliance Reminders

- 103 eligibility determinations were reviewed; 0 errors were identified.

Start Date of Eligibility

- The start date of eligibility for meal benefits is the date the application is approved by the Determining Official or the date Direct Certification is run. You may never backdate, unless in the case of running Direct Certification one day and not uploading it into the software system until the next day. In that case, you would put the start date of eligibility as the date you ran Direct Certification, as you have the documentation to support those eligibility statuses.

Disclosure

- For any staff that has access to students' eligibility status that isn't within the School Nutrition Office (i.e. IT Department, Principals, Secretaries) they should sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This is to protect the students from any overt identification. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website.

Transferring Students

- If a student had a free or reduced price meal eligibility at his/her prior school district, the prior school district can provide a copy to the district the student is transferring in to without question.
- The start date of eligibility is the date the Determining Official reviews and determines the application, signing and dating it.

Verification

Commendations

- Verification was completed in a timely manner and completed correctly.
- Verification Collection Report was completed prior to the February 1 deadline and completed correctly.

Meal Counting and Claiming

Commendations

The correct reports are used to complete the monthly claims for reimbursement. The Breakfast and Lunch claims for January were done correctly with no errors.

Technical Assistance

While watching breakfast service, it was noted that students were still hungry. It is allowable to serve and claim second breakfasts as long as it is not the intent of the School Food Authority to prepare excess food so that kids can eat seconds. To claim second breakfasts, they must be reimbursable and tracked through the software or a check off sheet.

*7 CFR 220.9 states: School Food Authorities shall plan for and prepare breakfasts on the basis of participation trends, with the objective of providing one breakfast per child per day. Production and participation records shall be maintained to demonstrate positive action toward this objective. In recognition of the fluctuation in participation levels which makes it difficult to precisely estimate the number of breakfasts needed and to reduce the resultant waste, **any excess breakfasts that are prepared may be served to eligible children and may be claimed for reimbursement** unless the state agency determines that the SFA has failed to plan and prepare breakfasts with the objective of providing one breakfast per child per day. In no event shall the SFA claim reimbursement for free and reduced price breakfasts in excess of the number of children approved for free and reduced price meals.*

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director for sending documentation ahead of time for the Administrative Review (AR) as this greatly expedited the AR process. Great job at offering fresh fruit and vegetables daily at lunch as well as many from-scratch recipes including the whole grain-rich bread. The director does a good job at encouraging young students to select veggies by using fun terms like “monkey leaves” for spinach leaves. Thank you for serving healthy meals to the students of Lake Holcombe!

Technical Assistance

Training

Anyone involved with the United States Department of Agriculture (USDA) School Meal Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts).

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g., ham sandwich). 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 the 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 to reflect the products and practices that are used in the kitchen. 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>).

Child and Adult Care Food Program (CACFP)

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. 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>).

The new Meal Pattern Charts for the CACFP meal pattern can be found on [USDA's 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).

Co-mingling flexibility

Children who are not yet in kindergarten must be served the updated CACFP meal pattern if not co-mingled with other age/grade groups at meals. Training and additional resources can be found 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>).

Sugar in cereal

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements. For more information, including the sugar limit charts, calculation examples, and cereals that meet the sugar requirements, please refer to 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>).

Grain-based desserts

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. Items with names such as "breakfast rounds" resemble grain-based desserts and are not a creditable grain under the CACFP meal pattern. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

Offer Versus Serve (OVS) in CACFP

Offer Versus Serve (OVS) is not an appropriate service style for pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at

each meal or the SFA may implement family style meal service. When using family style meal service, a sufficient amount of prepared food must be placed on each table to provide the full required portions of each of the food components for all children at the table, and to accommodate supervising adults if they eat with the children.

Family style meal service allows children to make choices in selecting foods and the size of initial servings. Children should initially be offered the full required portion of each meal component. Supervising adults should actively encourage (but not force) children to try components and accept full portions during the meal. If a child refuses to take one or more food components, he or she should be offered that food again before the meal is finished.

Training resources on family style meals may be found on SNT's [Infant and Preschool in NSLP](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>).

Additional resources are available on the Community Nutrition Team's [Nutrition and Wellness Training](https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice) webpage, under the Meal Service heading (<https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice>).

Milk in CACFP

Milk is a required component to be offered to children when using family style meal service. Chocolate milk cannot be served with the CACFP meal pattern. Small, child-size pitchers are recommended for children to serve milk to themselves. Teachers may serve the milk when using family style meal service, however, children must be served the full serving of milk when doing so. A variety of milk does *not* need to be offered under CACFP.

Multiple Entree Options, Meeting Daily and Weekly Requirements

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line (or entree) needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entree option, each entree option offered is viewed as one "line" and therefore needs to meet the daily as well as the weekly requirements.

Crediting

Many of the menu items were credited incorrectly on production records. Please note there is a difference between serving size and crediting (or meal pattern contribution). Most fruits and vegetables credit by volume served (e.g. ½ cup peaches credit as ½ cup fruit). Refer to the [Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (FBG) for more details on how specific ingredients credit toward the meal pattern (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>). Processed products which cannot be credited using the FBG require additional documentation like a Child Nutrition (CN) label or Product Formulation Statement (PFS). These typically will not credit ounce for ounce, meaning one ounce by weight will not credit as 1 oz. eq. M/MA. These will have the crediting directly on them (e.g. a Chicken patty may be 2.5 ounces by weight, but will credit 2 oz. eq. M/MA). When recording on production records, pay careful attention to the serving sizes versus the crediting of the menu item. The menu items below were credited incorrectly:

- Beef crumbles: serving size 2 oz - production record crediting states 2 oz. eq. M/MA (2 oz by weight will credit 1.5 oz. eq. M/MA)
- Yogurt: serving size 1 cup - production record crediting states 1 oz. eq. M/MA (1 cup yogurt credits 2 oz. eq. M/MA)

- Vegetables - serving size ½ cup - production record states 1 under F/V - (½ cup = ½ cup). This was done for the green beans, pears, and pineapples.

Enriched Grains

All grains offered and credited in school meal programs are required to be whole grain-rich. Foods that meet the whole grain-rich criteria must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. If using a product that only has enriched grains, this cannot be credited toward the meal pattern and cannot count as a component at lunch or a food item at breakfast. Additional whole grain-rich grains will need to be offered to students in addition to the enriched product.

Exhibit A

[Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf) is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1 oz. eq. for each specific group (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf). Exhibit A groups all grains products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:

- Group A: these products are hard and crunchy and dry and lightweight. Per ounce, they contain a good deal of grain.
- Group B: whether serving bagels, pizza crusts or tortillas, 1 ounce of these products all credit the same towards the meal pattern (1 ounce = 1 oz. eq. grain).
- Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1 ounce of pancake does not credit as 1 oz. eq. like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz. eq. grain.

Exhibit A can be used to credit any of the products that appear in this table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

Crediting documentation

As a reminder, a Child Nutrition (CN) label or Product Formulation Statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the *USDA Food Buying Guide for School Meal Programs*. Make sure these are kept on file for all applicable products. Please also note there are some items that do not credit as part of a reimbursable meal including imitation cheese and powdered cheese products. The imitation cheddar cheese used on the cheese pizza is not creditable, and the powdered cheese used for the macaroni and cheese is not creditable toward the meal program.

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. Continue to work with all staff members to record planned usage, actual usage, and leftovers for any food offered as part of a reimbursable meal including milk, salad bar, and alternate meal options.

The production record template currently in use is out-of-date and uses language that is not currently applicable and/or incorrect (e.g. Enhanced Food Based Menu, F/V grouped into one, (K-6) 12 per week (7-12) 15 per week for G/B). Furthermore, there is missing information, such as actual milk usage by

type, actual usage for condiments. Make sure serving sizes are one size and not a range. While there is no required production record template, there are some examples, including multiple age/grade groups, 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.

Printed Menu

The printed menu should list all components included with the reimbursable meal. Currently, all fruit offered is not listed on the breakfast menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of fruit is offered daily as part of the reimbursable meal.

Equipment Grant

The United States Department of Agriculture (USDA) distributes funding annually to State Agencies (SAs) to award equipment assistance grants to eligible School Food Authority’s (SFA’s) participating in the National School Lunch Program (NSLP). Priority for this grant will be given to schools that have not received similar USDA equipment grants in the past and have 50% or higher free and reduced-price eligibility. Requested equipment must cost more than the SFA’s definition of capitalization threshold or \$5,000, whichever is less. More information can be found on the [Equipment Grant Opportunities](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) webpage (<https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant>).

Breakfast Offer versus Serve (OVS)

Three meals observed during the day of onsite were non-reimbursable. Two did not contain ½ cup fruit and one did not have at least three food items. Technical assistance was provided onsite for what constitutes a reimbursable meal as well as what is a breakfast item. It is strongly encouraged to review breakfast OVS using the [OVS webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) provided on the training webcast webpage (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>) or by coming to the summer trainings.

Under Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered from the three components (grain [and optional meat/meat alternate], fruit/vegetable, and milk). An item is defined as 8 fluid ounces of milk; ½ cup of fruit and/or vegetable; and 1.0 ounce equivalent (oz. eq.) of grain (and optional meat/meat alternate). Visit the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) page for additional OVS guidance (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Findings and Corrective Action

- ❑ **Finding #1:** Recipes were not standardized for the peanut butter & jelly sandwich, turkey sandwich, ham sandwich, cheese pizza, chicken noodle soup, homemade bread, beef crumbles with mac & cheese, and spaghetti & meat sauce recipes.

Corrective Action Needed: Submit a standardized recipe for the menu items listed above with all required items (e.g. detailed instructions, serving size, etc.). A [Recipe Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc) may be used (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>).

- ❑ **Finding #2:** Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning 50% or more 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 (only exception is “water” labeled first). The fruit whirls, frosted flakes, cocoa munchies, rice crisps, corn flakes, and kluski noodles served during the week of review were not whole-grain rich.

Corrective Action Needed: Find a whole grain-rich version of the products listed above and submit nutrition facts labels and ingredient lists.

- ❑ **Finding #3:** There was a daily fruit shortage for 9-12 at breakfast during the week of review.
- On 1/9/18 when the pears (½ cup) were offered. No fruit recorded on production records (minimum of 1 cup fruit required daily for K-12 at breakfast).

Corrective Action Needed: Please state what you will do to 1/9/18 so that a full 1 cup fruit is offered to 9-12 students at breakfast. Review the [breakfast meal pattern table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table.pdf) (and [lunch meal pattern table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf)) for reference (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table.pdf>) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>).

- ❑ **Finding #4:** Daily Meat/Meat Alternate (M/MA) shortages were found during the week of review when the alternate PB&J sandwich, spaghetti & meat sauce, and cheese pizza were offered during.
- **PBJ:** There was no standardized recipe provided neither was one being followed. The peanut butter was not being measured out to ensure a full 2 oz. eq. M/MA was offered to 9-12 students. It appeared that at least 2 Tbsp (1 oz. eq. M/MA) of peanut butter was on each sandwich.
 - **Spaghetti & Meat Sauce:** Beef crumbles credit (1.15 oz by weight = 1 oz. eq. M/MA). If using 30 # (or 480 oz by weight) of beef crumbles for 265 servings, this will provide 1.5 oz. eq. M/MA per serving (480 oz ÷ 1.15 oz = 417.39 oz. eq. ÷ 265 servings = 1.5 oz. eq. M/MA per serving).
 - **Cheese Pizza:** The imitation cheddar cheese used in this recipe is not creditable toward child nutrition programs. The mozzarella is and provides 1.5 oz. eq. M/MA per serving.

Corrective Action Needed: Please state what you will do to the PB&J, Spaghetti & Meat Sauce, and Cheese Pizza (or what M/MA you will add), to ensure a full 2 oz. eq. M/MA is offered to 9-12 students, daily.

- ❑ **Finding #5:** Weekly Meat/Meat Alternate (M/MA) shortage was found during the week of review when the alternate PB&J sandwich was offered. There was no standardized recipe provided neither was one being followed. The peanut butter was not being measured out to ensure a full 2 oz. eq. M/MA (4 Tbsp) was offered to 9-12 students. Because of this daily shortage, the weekly required quantity of 10 oz. eq. M/MA for 9-12 students could not be met.

Corrective Action Needed: Please state what you will do to the alternate meal choice so that a full 10 oz. eq. M/MA is offered to 9-12 students, weekly.

- **Additionally, fiscal action is required for any repeat violations from the previous Administrative Review. Because a weekly M/MA shortage was found during the last AR (legumes) as well as the current AR, fiscal action will be applied. Per page 82 of the Administrative Review Manual, there will be a re-claim for meals for one weekday with the lowest participation at each AR site with a weekly quantity insufficiency. The following repeat finding was documented from the School Year (SY) 2014-15 Administrative Review:**
 - “The ½ PBJ sandwich that is offered daily does not meet the weekly grain and meat/meat alternate meal pattern requirements.”

3. RESOURCE MANAGEMENT

Commendations

PLE Tool

- SFA is running the PLE tool correctly and adhering to the required lunch price increases every year by exceeding the necessary 10 cent weighted average increase.

- USDA has not yet released the PLE tool for the 2018-19 SY. Once it is released, you will get an email through the SNT listserv.

Technical Assistance/Compliance Reminders

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"](#). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](#).
- The SFA currently has a written unpaid meal charge policy in place. The policy needs to be more specific when talking about at what point the students will have to take an alternate meal.
- Consider updating the policy to include at what point the households will be notified of a negative account balance, include when and how often you will notify families of this, and whether an alternate meal will be given when the student has exceeded the negative account balance threshold set by the district.
- You may decide to have a stricter policy for high school students than the middle school or elementary school. If this is done, be sure to outline the different policies for each grade grouping and send the policy out to households so it is clearly communicated.
- If alternate meals are being claimed, they must meet meal pattern. The difference between the cost of the alternate meal (labor, food cost, etc.) and the reimbursement cannot be absorbed by Fund 50. A transfer must be made to Fund 50 for the difference.
- If alternate meals are not being claimed and the student isn't charged, you may serve the student(s) any food/beverage you decide at no charge. It does not have to meet Smart Snacks. However, you must keep track of the cost of those items served as well as labor and any other costs incurred to make a fund transfer into Fund 50. Non-federal funds must cover the cost of these alternate meals.

Allowable Costs

- 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, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found on the Financial Management webpage. A best practice is to continue to collect on the unpaid meal charges as long as you are able to and the student is still enrolled. If unable to collect, then a transfer is required to Fund 50 from Fund 10 or another non-federal fund.
- Per question 15 of the [Financial Q&A](#), student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50. Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50.

Refunds of Student Meal Accounts

- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](#) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Revenue from Nonprogram Foods

Commendations/Comments

- Using the Child Nutrition Program Report from the 16-17 SY and the below USDA Nonprogram Food Revenue Tool, the SFA is in compliance with the Nonprogram Food Revenue regulation.

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at the school district include: Adult Meals, Extra Entrees, and Extra Milk.
- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#), located on the SNT website, feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation.

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

- The [Menu Raw Food Costing Tool](#) is an excellent tool to cost out your reimbursable meals and extra entrees. It is also helpful in completing the [DPI Nonprogram Food Price Calculator Tool](#) which will also calculate the USDA Non Program Food Revenue calculation for you automatically. To ensure you are pricing the extra entrees correctly, use the Menu Raw Food Costing Tool and the DPI Nonprogram Food Price Calculator Tool.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed for all staff involved with the School Nutrition Programs. The PI 1441 form was completed correctly and prior to the October 31 deadline.

Local Wellness Policy

Commendations

The SFA does have a Wellness Policy in place and was recently updated. Thank you for having a wellness policy on file and working to assure students are on the path for a healthy lifestyle.

Technical Assistance: Local 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. 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).

SFA is required to complete an assessment of the LWP:

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA’s policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team’s Wellness Policy webpage](#). A sample model wellness policy is available at the [USDA Wellness Policy webpage](#). Public School Districts that participated in the Wisconsin Obesity Prevention’s Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school’s report is available at the [Wisconsin Health Atlas webpage](#). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

SFA required to inform the public of the results of the most recent assessment:

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 notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA’s LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

DPI’s Team Nutrition has developed a toolkit and other resources to assist schools with building their [wellness policy](#). Schools can chose from several standardized language options in the toolkit that comply with USDA’s regulations and tailor it to their school needs.

Finding #1: The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](#). **Provide a timeline of when you plan to have**

the policy updated and compliant with the final rule. The [Wellness Policy Builder](#) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy.

Special Dietary Needs

Technical Assistance

Students seeking accommodations for a diet-related disability must provide a medical statement signed by a licensed medical practitioner (such as a physician, nurse practitioner, or physician assistant). The signed medical statement must include a description of the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, and an explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted). More information regarding accommodating special dietary needs, including a physician's form template, can be found on the [Special Dietary Needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Smart Snacks

Technical Assistance

Fundraisers

- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization, per school, per school year, not to exceed two consecutive weeks each. These exempt fundraisers may not sell food in the meal service area during meal service times.
- The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Smart Snacks Tracking Tool

One requirement for school fundraisers is documentation. Keeping records of school fundraisers, both compliant and non-compliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations. Tracking Tools for fundraisers can be found on [DPI's Smart Snacks Webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks). (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). Great job to Holcombe School District for tracking compliant and non-compliant fundraisers!

Professional Standards

Comments/Commendations

The Bookkeeper and Food Service Manager share the majority of the program duties.

The Food Service Manager is doing a wonderful job making sure staff are getting their required training hours throughout the school year, that pertain to their job duties.

Technical Assistance

Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).

- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

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

Findings and Corrective Action

- ❑ **Finding #1:** Training is not being monitored on a tracking tool. Clearly document all training information, the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff).

Corrective Action Needed: Include all current training hours for each employee involved in the school nutrition programs (Bookkeeper, Food Service Manager, Food Service Employees) onto the [DPI tracking tool](#) or create your own on a Google Sheet. **Submit a copy of the tracking tool with trainings entered.**

Buy American

Technical Assistance

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

Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification.

There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product

- e. Distribution- record the reason the distributor carries the non-domestic product
- f. Other- explain

You may record additional information if you find it beneficial.

A suggested template is found on the [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage under Buy American Noncompliant Product list (word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action

- ❑ **Finding:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant form:
 - Grapes (Chile)
 - Canned, Mandarin Oranges (China)
 - Canned, Pineapple Tidbits (Indonesia)
 - Bell Peppers (Mexico)
 - Roma Tomatoes (Mexico)
 - Cucumbers (Mexico)
 - Canned Tuna (Thailand)
 - Bananas (Guatemala)

Corrective Action Needed: Begin using a Non-compliant Product form for tracking non-domestic products. Provide a copy of the form that will be used and include any non-compliant products currently in the SFAs food storage areas. A [Template Form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) from DPI's Procurement webpage may be used (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Food Safety and Storage

Technical Assistance

Sharing Tables and No Thank you Tables

Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.

A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, a designated worker or trained individual must inspect the items for wholesomeness.

Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.

Considerations

- School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
- Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
- The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
- Parents will be informed in writing.
- The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
- Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
- Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
- Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

Wholesome Leftovers

- Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. "Wholesome" must be defined by the SFA as part of the SOP.

Only non-time/temperature control for safety (TCS) food items may be re-served in child nutrition programs. TCS foods include milk, cheese, and yogurt, among many other food items. Currently, milk is being reserved in child nutrition programs, which is unallowable.

Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state, which accounts for the vagueness of the SOP template. SOP templates must be site-specific rather than district-specific. The School Nutrition Team does not ensure monitoring of sharing or no thank you tables, control of allergens, or other non-eligible items outside the scope of an Administrative Review (AR).

Findings and Corrective Action

- ❑ **Finding #1:** The most recent Food Safety Inspection was not posted at Lake Holcombe High School.

Corrective Action Needed: Post the most recent Food Safety Inspection in the cafeteria or in the hallway outside of the cafeteria for the public to view. **Submit a statement in writing this has been completed.**

- ❑ **Finding #2:** Standard operating procedures (SOPs) regarding the [Afterschool Snack Program](#), [Milk Barrels](#), and Time as a Public Health Control for TCS Food are not included in the food safety plan at Lake Holcombe School District. SOPs are required for all applicable programs and processes occurring at the site.

Corrective Action Needed: Create or adapt SOPs (from the [SNT website](#)) to reflect *site-specific* procedures—particularly referring to Breakfast in the Classroom, Field Trips, and Time as a Public Health Control for TCS Food. TCS food (cheese sticks, sour cream, yogurt) is removed from temperature control (mechanical refrigeration) and put onto the serving line without any ice or mechanical refrigeration. This requires a site specific SOP for the use of **Time as a Public Health Control**. Time as a public health control is used when hot or cold food is removed from temperature control for display or sale. The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold TCS food. TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service. Work with your local sanitarian to create/edit these 3 SOPs. **Submit a copy of the 3 updated SOPs regarding the Afterschool Snack Program, Milk Barrels, and Time as a Public Health Control to the DPI Nutrition Program Consultant via email.**

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All documents pertaining to the School Nutrition Programs 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. In other words, keep all documents for 3 years plus the current school year.

School Breakfast Program (SBP)

Technical Assistance

- At the beginning of the school year, the SFA notifies families of the availability of breakfast through the public release, providing brochures, and posting the breakfast menu.

Summer Food Service Program (SFSP) Outreach

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 operated at Lake Holcombe School District during summer school as an open site.

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](#) 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](#) 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>).

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program

Commendations

- The claim for the 2016-17 school year was correctly consolidated and claimed for.

Findings and Corrective Action

- Finding #1:** The WSDMP contract on file is outdated.
Corrective Action: Complete a new WSDMP contract and send to the consultant for review.
- Finding #2:** The milk served to students for the WSDMP is not from milk produced in Wisconsin. It is from Minnesota. Refer to question 12 of the [WSDMP FAQ](#). All or part of the raw milk used by the milk processor must be produced in Wisconsin. The goal of this program is to support Wisconsin dairy farmers.
Corrective Action: Submit a statement of how you will make sure all or part of the milk served within the WSDMP is from raw milk produced in Wisconsin.

Afterschool Snack Program (ASP)

Technical Assistance

- Students in grades K-8 are being offered 3 components and allowed to take 3 components. The [meal pattern](#) for the Afterschool Snack Program shows students ages 1-12 must have the planned food components and food portions pertaining to the meal pattern. Students ages 13 and above, may have larger portions than specified on the meal pattern, to meet nutritional needs.
- Students must take 2 full planned components in order to be claimed for a reimbursable snack.
- Since the Elementary school qualifies for Area Eligible Afterschool Snack, you do not need to keep a roster check list for the point of sale. You may use [this check off sheet](#) to track reimbursable snacks served.
- All grain items served must be whole grain rich or with enriched flour.

Findings and Corrective Action

- Finding #1:** Production records are not being used.
Corrective Action: Begin using the [DPI production records](#) for each day the Afterschool Snack Program is operated. **Send a week's worth of completed production records to the consultant.**

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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!