

*Date:* August 23, 2016

*To:* Authorized Representatives and Food Service Directors of School Food Authorities (SFAs) Participating in the U.S. Department of Agriculture (USDA) Child Nutrition Programs (CNP)

*From:* Jessica Sharkus, RDN, CD  
Director-School Nutrition Team

*Subject:* Back to School Memorandum for School Year (SY) 2016-17

Please forward this important information to all persons with USDA  
Child Nutrition Program responsibilities.

Welcome Back! I know this probably looks overwhelming (I'm sorry!), but please take the time to read through this important information. This memo is written at the start of each new school year to provide you with important clarifications, reminders, and updates pertaining to the CNPs. In addition, we ask that you share this with others that may need to know this information as well.

#### **Email Distribution List**

As the Authorized Representative or Food Service Director for your SFA, you have been automatically signed up to receive our electronic messages through our new email distribution list ([join-schoolmealsnews@lists.dpi.wi.gov](mailto:join-schoolmealsnews@lists.dpi.wi.gov)). Please feel free to invite others within your SFA to join. We are hoping to move toward being paperless by January 2017. Please contact us if this is an issue for your SFA.

We want to be able to reach everyone that needs to see our important information in a timely fashion. We will be using this list to provide you with quick access to valuable information provided in USDA guidance memorandums and other important Department of Public Instruction School Nutrition Team (DPI SNT) information. The email distribution list will eventually take the place of the paper DPI SNT memos and most other mailings from us as well. Also, we will be sharing our social media links and program promotion campaign information.

You can expect to see the School Nutrition Bulletin from us on the 2<sup>nd</sup> and 4<sup>th</sup> Tuesdays of the month starting September 2016. We may need to send emails more often if there is something of great importance that needs to be communicated, but we will send out a message at least twice a month. Past School Nutrition Bulletins will be posted on our website on our [team communication](#) page.

### **Program Promotion**

The goal of our social media campaign is to highlight some of the wonderful things that are happening in schools throughout Wisconsin. We are hoping to assist in increasing participation through sharing great ideas and best practices. Check out videos that showcase best practices happening in SFAs around Wisconsin on our [Wisconsin School Meals Rock!](#) Webpage. Please contact the SNT if you have a great story to share.

### **#WISchoolMealsRock**

We encourage you to use the hashtag #WISchoolMealsRock when posting to your Facebook and Twitter accounts. We also hope that you will tag us on your posts as well. This can be done by tagging us at WI DPI School Nutrition Programs on Facebook and using the handle @WisDPI\_SNP on Twitter. This is a great way to share new recipes, photos of your menu items for the day, best practices, etc.

### **Social Media: Twitter and Facebook Accounts**

During our summer School Nutrition Skills Development Courses (SNSDC), we offered a new class on social media. The class covered the basics of getting up and running with Facebook and Twitter, including the benefits of each platform and how they can help promote your school meal programs. If you missed our summer classes and are interested in starting an account or some tips on creating a powerful profile or crafting the perfect message for your audience, please contact Rebekkah Plano, Public Health Nutritionist at [rebekkah.plano@dpi.wi.gov](mailto:rebekkah.plano@dpi.wi.gov).

### **Eligibility Manual**

The 2016 version of the [Eligibility Manual for School Meals](#) was released by USDA (via Policy Memorandum SP 50-2016) in July and reflects pertinent policy memoranda changes made since the last update. Updates to the manual are highlighted in yellow to help you identify information that has changed.

### **Community Eligibility Provision (CEP)**

On July 29, 2016, USDA published the final rule titled *National School Lunch Program and School Breakfast Program: Eliminating Applications through Community Eligibility as Required by the Healthy, Hunger-Free Kids Act of 2010*. Highlights from this final rule include the following:

- CEP and Provision 2 schools are now required to run direct certification annually.
- State agencies are required to confirm local educational agency (LEA) eligibility to elect CEP.
- Individual schools in a CEP group may have an identified student percentage (ISP) of less than 40 percent as long as the ISP of the group is at least 40 percent.
- For student transfers during the SY within a LEA, a student's access to free, reimbursable meals under CEP and Provision 2 must be extended by a receiving school using standard counting and claiming procedures for up to ten operating school days or until a new eligibility determination for the current SY is made, whichever comes first. For student transfers between LEAs, this requirement applies no later than July 1, 2019. At the State Agency's (SA) discretion, students who transfer within or between LEAs may be offered

free reimbursable meals for up to 30 operating days or until a new eligibility determination for the current SY is made, whichever comes first.

The final rule may be found on the [USDA Final Rule](#) webpage.

### **Ensuring Year-long Eligibility in the National School Lunch and School Breakfast Programs**

USDA recently published a memorandum (SP 51-2016) strongly encouraging LEAs to accept the eligibility determination for free and reduced price meals from a transferring student's former LEA. Once a child is determined eligible for free or reduced price school meals, that eligibility must remain in effect for the entire SY and for up to 30 operating days into the subsequent SY.

- Transferring to a new school within the same LEA: When a student transfers to a new school within the same LEA, the new school must accept the eligibility determination from the student's former school.
- Transferring between LEAs: When a student transfers to a new LEA, the new LEA is permitted, and strongly encouraged, to accept the eligibility determination from the student's former LEA. A lapse in school meal benefits could occur if the eligibility determination is not accepted by the new LEA and cause financial stress to the family. Documentation of eligibility determination from the former LEA can be in the form of an email, which contains source documentation of eligibility (such as a copy of an application or a copy of the direct certification list). **IMPORTANT:** LEAs do not need a parent or guardian's consent to disclose student information to administrators of other school meal programs to determine a student's eligibility for school meal programs, and they can include this information in the transferring student's file.
- Effective date of eligibility: LEAs that choose not to accept a previous LEA's determination of a transferring student's eligibility have the flexibility to establish the date of application submission, rather than the certification date, as the eligibility date, but must do so for all students. LEAs choosing to do this need to notify Karrie Isaacson at [karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov).
- Special Provisions (Provision 2 and CEP): LEAs must provide up to ten operating days (or until a new eligibility determination is made, whichever comes first) of free, reimbursable meals to students who transfer from a Provision school to a non-Provision school *within the same* LEA. The DPI SNT has the discretion to allow LEAs to provide up to 30 operating days of free meals to students who transfer from Provision to non-Provision schools *within the same* LEA, both during and between school years. Effective for the start of SY 2016-17, the DPI SNT *requires* LEAs to provide up to 30 operating days.
- **PLEASE NOTE:** By July 1, 2019, LEAs will be required to provide up to ten school days of free meals to students who transfer from a Provision school to a non-Provision school in a *different* LEA. The DPI SNT encourages LEAs to implement this earlier if possible. If allowing this at your LEA, effective for the start of SY 2016-17, the DPI SNT requires LEAs to provide up to 30 operating days (or until a new eligibility determination is made, whichever comes first) of free meals.

### **Early Implementation of Eligibility Carryover Period for Students Transitioning from Provision Schools: State Agency Extension Option**

USDA recently published a memorandum (SP 52-2016) that authorizes the DPI SNT to allow LEAs to provide “carryover” eligibility for free school meals for the first 30 operating days of SY 2016-17 to those students transitioning to non-Provision schools from schools participating in special Provisions, such as Provision 2 and CEP. This will limit disruptions in providing meal benefits to low-income students and minimize the burden on the affected LEAs. Meals served during the carryover period would be claimed at the “free” rate. The DPI SNT *will allow* early implementation of this new regulatory provision. Effective for the start of SY 2016-17, the DPI SNT *requires* the 30 day carryover for students transitioning to a non-Provision school from a Provision school.

### **Administrative Reviews**

Those SFAs receiving an Administrative Review (AR) during the SY 2016-17 have been notified. If you are unsure if you are receiving an AR, please visit our [AR](#) webpage.

The USDA Final Rule titled *Administrative Reviews in the School Nutrition Programs* was published on July 29, 2016, with an effective date of September 27, 2016. New in this final rule are the following items:

- **Statutory Provision (transparency requirement):** The SNT is now responsible for posting a summary of the most recent AR results for each SFA on our website. The review summary must cover eligibility and certification review results, an SFA’s compliance with the meal patterns and the nutritional quality of school meals, the results of the review of the school nutrition environment (including food safety, local school wellness policy, and competitive foods), compliance related to civil rights, and general program participation and must be in a format prescribed by USDA Food and Nutrition Service (FNS) not later than 30 days after the SA provides the final results of the review to the SFA. In addition, the SA must make a copy of the final AR report available to the public upon request.
- **SFA regulatory requirement changes:** The SFA annual on-site monitoring of schools, required in 7 CFR 210.8, is strengthened by incorporating readily observable general areas of review. Readily observable areas of review could include, but are not limited to, the availability of free potable water, proper food safety practices, and compliance with Civil Rights requirements. The final rule also extends SFA on-site monitoring to the School Breakfast Program. This monitoring must be done annually at a minimum of 50 percent of the schools operating the School Breakfast Program under its jurisdiction, with each school operating the School Breakfast Program to be monitored at least once every two years. This monitoring would include the counting and claiming system used by a school and the general areas of review that are readily observable. USDA will be providing a prototype monitoring tool that will be posted to our website as soon as it is made available.

## **Procurement Reviews**

The USDA issued memo SP 45-2016 to introduce the new *Draft* Local Agency Procurement Review Tool (“Tool”). The Tool is intended to assist the DPI SNT in conducting procurement oversight of SFA procurement procedures in SY 2016-17. The Tool contains questions, references to regulations, and guidance.

It also provides resources to:

- 1) evaluate SFA procurement procedures;
- 2) assess compliance;
- 3) capture technical assistance provided; and
- 4) establish findings and required corrective actions, as needed.

The Tool itself is not required for a procurement review, but the areas/questions covered in the Tool are required areas for a procurement review. We will continue to provide training on the Tool. Those SFAs receiving an AR this year will also be receiving a procurement review.

## **Procurement**

Coming soon to the [Procurement](#) webpage: “*Procurement Policy and Procedure Manual templates*.” As part of the new 2 CFR 200 Office of Management and Budget Guidance for Grants and Agreements, all SFAs are required to have written procurement procedures. The templates will be available to help SFAs maintain compliance with this federal requirement and other similar procurement federal regulations. SFAs can modify the templates to reflect actual procurement processes and local regulations. The DPI intends to offer future procurement trainings on the Procurement Policy and Procedure Manual templates.

## **Alternate School Food Authority Agreement**

The SNT is dedicated to the health and well-being of all students in Wisconsin. This dedication to students is dependent on our ability to work with SFAs and to provide options that promote participation in the USDA CNPs. To ensure students have access to nutritious meals, we are announcing a new option to assist SFAs (and schools no longer participating) challenged with the administration of the CNPs.

An Alternate School Food Authority Agreement is an agreement between two SFAs or a SFA and a school, in which one SFA agrees to operate the school meal programs for a SFA/school not under its jurisdiction. By way of this agreement, the other SFA/school relinquishes its authority to operate the school meals programs and transfers legal and financial authority. The parties to this agreement agree to cooperate fully, to work in good faith, and to mutually assist each other in the performance of the agreement.

This is a great opportunity for public school districts to collaborate with local private schools that are challenged with or lack sufficient resources to manage the administrative piece of the CNPs. The SNT is fully supportive of this kind of collaboration; which is essential to providing these programs to more students. A copy of the [DPI SNT memo and Alternate SFA Agreement](#) can be found on our website.

### **Smart Snack Updates for SY 2016-17**

For the SY 2016-17, a SFA is no longer able to qualify a food under Smart Snacks using the fourth general standard (contain 10 percent of the daily value of one of the nutrients of public health concern in the 2010 Dietary Guidelines for Americans; i.e., calcium, potassium, vitamin D, or dietary fiber). In addition, the sodium standard for snacks and sides is now  $\leq 200$  mg (reduced from  $\leq 230$  mg).

The USDA final rule *National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School as required by the Healthy, Hunger-Free Kids Act of 2010* was released on July 29, 2016. The USDA also published a new resource titled *A Guide to Smart Snacks in School* in July 2016, which provides the requirements of the regulations. This resource and the final rule/interim final rule can be found on the [USDA Final Rule: National School Lunch Program and School Breakfast Program](#) webpage.

Important to note that the 2015-2020 Dietary Guidelines for Americans did not include a key recommendation for total fat; therefore, this final rule retains the rules related to the standard for total fat as an interim final rule. USDA is requesting comments for total fat and will accept feedback until September 27, 2016, through Regulations.gov.

### **Nonprogram Foods**

All food sold in a school and purchased with funds from the nonprofit school food service account, other than meals and supplements reimbursed by the USDA, must generate revenue at least equal to the full cost of such foods. To help SFAs meet this requirement, the SNT created some new tools to help SFAs achieve this requirement. Check out our [Financial Management](#) webpage.

### **Upcoming Training Opportunities**

Please check our [training](#) webpage frequently to view upcoming training opportunities.

- [What's New with School Nutrition](#) - Found under "Recurring Trainings" on our training webpage, are monthly webcasts (2<sup>nd</sup> Tuesday of the month starting at 2 PM) that include USDA policy updates for all school nutrition programs, grants, and reauthorization/final rule guidance.
- *Pre-review Workshops* - We currently have plans to conduct Pre-Review Workshops for those SFAs selected for ARs this SY and are starting to determine locations and the agenda. More information will be coming out soon about these workshops.

### **School Nutrition Skills Development Courses (SNSDC)**

The SNT will be sending out an email blast with a link to an electronic survey for those who participated in the SNSDC courses over the summer (June-August). If you participated in one or many of our classes, we would greatly appreciate any and all feedback. Feedback is requested by September 15, 2016.



### **Professional Standards-Continuing Education Training Hours**

Just a reminder that training hours increase in SY 2016-17 as follows:

- Director: 12 hours
- Manager: 10 hours
- Staff: 6 or 4 hours based on number of hours worked per week.

There was a recent FAQ with changes that we will highlight in an upcoming SNT memorandum.

### **Professional Standards-GOALS**

The SNT invites you to use our free, online tool called GOALS. GOALS is an acronym for Goal Oriented Achievement Learning Skills, a resource that provides training opportunities for Wisconsin school nutrition professionals to meet USDA professional standards regulations.

The main purposes of the GOALS initiative are to: 1) provide the resources needed to complete USDA professional standards training requirements, 2) assist school nutrition staff in performing their jobs to the best of their abilities, and 3) provide school nutrition staff with professional credibility by earning a Certificate of Excellence in school nutrition management and operations.

GOALS is a tiered learning system where participants can find and access training resources specific to their roles and responsibilities as child nutrition professionals. The website is easy to use and includes training resources, tracking tools, and requirements for earning a Certificate of Excellence. Some benefits of the GOALS initiative include:

- Training resources and tracking tools that satisfy USDA Professional Standards regulations.
- Compatibility with the School Nutrition Association's certification program.
- Opportunities for career advancement in the field of school nutrition for food service employees that do not have a formal degree.
- The opportunity to be professionally recognized for your expertise in the field of school nutrition and the critical role you play in ensuring that Wisconsin students are well nourished and ready to learn.

Get started on reaching your GOALS. Simply go to the [GOALS](#) webpage at any time and follow the steps to link from one training resource to another based on your training needs.

### **ServSafe Training - What are Your Needs and How Can We Help?**

We recently sent out an email blast with a survey to gather information on how Wisconsin SFAs are fulfilling food safety requirements under Act 46, which requires one person in each SFA to acquire a certificate of food safety practices, also known as a Food Manager Certificate, from the State of Wisconsin. Since most participants meet this requirement by taking the ServSafe class and a proctored exam, the information you provide will help the SNT understand the needs of SFAs in our state and help us plan future trainings.

Authorized Representatives and Food Service Managers, please take 5 minutes to fill out the ServSafe Training survey so we can do our best to meet your training needs.

## **Reports Reminder**

The SNT has created a variety of annual calendars to help SFAs with report deadlines and reminders. Various Calendars of School Nutrition Program Requirements can be found on our [School Nutrition Team Communications](#) page under *Calendar of School Nutrition Program Requirements*.

## **Annual Food Service Financial Report**

All agencies participating in the National School Lunch and/or School Breakfast Program are required to submit an Annual Food Service Financial Report which:

- Reports all revenues and expenditures for your food service operation from July 1 through June 30.
- Reports your beginning fund balance, as of July 1 of the year being reported.
- Calculates the ending balance as of June 30 of the year being reported.
- Must be submitted by August 31, yearly

This report serves to document non-profit status and determine if the SFA has an excess cash balance.

It has been a long time coming, but the SNT is happy to announce that we have revised and updated the school food service program Annual Financial and Child Nutrition Program reports. The updated reports will be used starting SY 2016-17, which will include all revenues and expenditures from July 1, 2016, through June 30, 2017.

Information related to the updated Annual Financial Report can be found on our [Financial Management](#) website.

## **Local School Wellness Policies (LWP)**

In a USDA final rule published on July 29, 2016, titled *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010*, there are new requirements on who is a member of the wellness committee and what is included in the wellness policy. Also new is the requirement to conduct an assessment of the LWP at a minimum of every three years. USDA is planning on creating a Question and Answer guidance to be published this fall. The final rule and resource are posted to our [School Wellness Policy](#) website. The deadline for full compliance to the new regulations is June 30, 2017. We encourage you to attend the 5<sup>th</sup> school wellness summit, *Stepping Up School Wellness*, hosted by our Team Nutrition staff. See below for more information.

## **Team Nutrition Printed Resources**

Wisconsin Team Nutrition has a variety of school nutrition resources available for schools to request at no cost. These resources include nutrition education curriculum guides, cookbooks, and reimbursable meal dry-erase signage. Order copies of the resources through the [Wisconsin Team Nutrition Resource Order Form](#) on the Team Nutrition webpage.



### **School Wellness Summit**

Wisconsin Team Nutrition is excited to host the 5<sup>th</sup> school wellness summit, *Stepping Up School Wellness*, on November 15, 2016, in the Wisconsin Dells. The summit will offer concurrent sessions from four wellness tracks: *School Nutrition*, *Physical Activity*, *Wellness Beyond the Classroom*, and *Wellness Policy*. Breakout sessions of interest for school foodservice personnel include Building a Better Breakfast, Marketing Your Meals, Enhancing Your Program with Student Involvement, Local Wellness Policy 101, and many more! Agenda and registration information will be posted on the [Team Nutrition](#) webpage in early September.

### **Equipment Grant Opportunity**

The School Nutrition Team (SNT) is pleased to announce that funding is available to award another round of National School Lunch Program (NSLP) Equipment Assistance Grants. The USDA provided Wisconsin with \$414,227 in funding for these grants. The requested equipment must have a useful life of greater than one year and a cost that exceeds \$5,000 or the applicant SFA's definition of capitalization threshold, whichever is less. More information can be found on the USDA Equipment Grant webpage. Applications will be available at the beginning of October and the deadline to apply will be **November 11, 2016**.

### **School Food Service Equipment Purchases**

SFAs that wish to purchase equipment that exceed the SFA's capitalization threshold or \$5,000 (whichever is less) out of their nonprofit school food service account (Fund 50) must first check if the expenditures are preapproved by the DPI SNT. Review the list of [preapproved equipment](#). If the desired equipment is not on this list, SFAs must obtain permission from the SNT prior to purchasing the equipment out of their nonprofit school food service account. During the AR process, the SNT will ensure allowable equipment purchases were made based on the preapproved equipment list or the prior approval process. If unallowable purchases are identified or are improperly procured, the SNT would determine if a fund transfer from nonfederal sources to the nonprofit school food service account would be required. Visit the [Equipment Purchase Preapproval Process](#) webpage for more information.

### **USDA Foods**

For SFAs receiving USDA Foods through participation in the National School Lunch Program, the DPI's USDA Foods section of the SNT sends out a packet that provides detailed information regarding Wisconsin's USDA Foods Program at the beginning of each school year. This packet includes information such as general program policies and procedures, delivery service and receiving procedures, and other USDA Foods Program updates. For more information, please review the Wisconsin USDA Food's *School Year 2016-2017* [Back-to-School Packet](#), which was mailed to participating SFAs earlier this month.

In addition, earlier this month, the USDA Foods section of the SNT also sent out information on an additional SY 2016-17 USDA [Foods ordering opportunity](#).

### **Great Lakes Great Apple Crunch**

Help celebrate National Farm to School Month by crunching into locally and regionally grown apples at NOON on Thursday, October 13! This can be done at schools, early care settings, hospitals, or other organizations in Wisconsin as well as throughout other states in the Great

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Lakes region including Minnesota, Illinois, Indiana, Michigan, and Ohio. Go to the UW-Madison webpage and identify your state to [register for the Great Lakes Great Apple Crunch!](#)