

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

School Food Authority: Rio Community School District Agency Code: 114865

School(s) Reviewed: Rio High School

Review Date(s): January 8-9, 2019

Date of Exit Conference: January 9, 2019

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Rio Community School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance

The DPI review team appreciates the eagerness of the staff at Rio Community School District for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu and customer service. We were impressed during meal service with the large selection of fresh fruits and vegetables. The students seemed to love them!

The USDA National School Lunch Program is a very complex program that requires a great deal of time and dedication. It is evident that the food service director has attended trainings in multiple areas. We are confident that the Rio Community School District will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Technical Assistance (TA)

131 eligibility determinations were reviewed. There were no errors when determining benefits. The foodservice director did a great job processing direct certification benefits and processing applications/determining income frequencies. There was one incomplete application that was missing the number of household members and the date of approval. This was corrected on-site.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.

- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Verification

Commendations/Technical Assistance (TA)

Verification was completed correctly and within the required timeframe. The Verification Collection report was completed well before the due date.

- When applications are chosen for verification, the person designated as the Confirming Official (per your contract) must review the application(s) to ensure the initial determination is correct prior to contacting the family. The Verifying Official would then sign the application when they have completed the verification process.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance (TA)/

The meal claim for the Review Month was conducted correctly using the Skyward Accuclaim report. All breakfast claims, special milk claim and elementary lunch claim were done perfectly.

- There was an over claim of one meal in the paid category at the high school. This is a non-systemic error and will not require further claiming information to be provided.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of Rio Community School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. The Food Service Director is positive and receptive to feedback. She and the school nutrition professionals work hard to plan, offer, and serve nutritious meals to students at both breakfast and lunch. The kitchen and office are tidy and well-organized. Special thanks to the school nutrition professionals who overcame nervousness to ask questions and share details about their work! Thank you for submitting documentation both off-site and on-site and for responding promptly to questions and requests for additional information. We appreciate it!

Technical Assistance and Program Requirement Reminders

USDA Food Buying Guide for Child Nutrition Programs

The [USDA Food Buying Guide for Child Nutrition Programs](#) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, meat/meat alternates (m/ma), and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on “food items search” and type in a specific food in the “keywords” search box. Many different

options may appear. Find the entry that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.

A webinar presented by USDA Child Nutrition Programs Nutrition & Technical Assistance Branch showcased the new FBG Mobile App and FBG Interactive Web Tool via a demonstration. Learn how to utilize the innovative features of these tools including search and navigation, the ability to compare food yield information, and the ability to create a favorite foods list. Access the [recorded webinar](https://youtu.be/UP_t3D7AYAM) (https://youtu.be/UP_t3D7AYAM) on the [Food Buying Guide Goes Digital! webpage](https://www.fns.usda.gov/tn/food-buying-guide-goes-digital) of the USDA Food and Nutrition Service website (<https://www.fns.usda.gov/tn/food-buying-guide-goes-digital>).

Reference the School Nutrition Team (SNT) [Half-Cup Crediting of Fruits and Vegetables Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) for amounts required to credit as 1/2 cup as well as suggested serving sizes (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>).

According to the FBG entry for Cantaloupe, fresh, Whole, 18 Count, one pound of cantaloupe (as purchased) yields 5.73 one-quarter cup servings of cubed or diced fruit (edible portion) melon. One-quarter cup serving is about 1/10 medium melon.

Crediting Documentation

Processed foods that are not listed in the FBG must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. Secure a PFS directly from the manufacturer or save a CN label directly off the packaging. Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

Fruit Cups

According to guidance from the USDA Midwest Regional Office, manufacturers are allowed to declare volume measurements contained in fruit cups as a means of crediting information (i.e. 3/8 cup of mandarin oranges and 1/8 cup of 100% fruit juice). Additional documentation must be provided. Manufacturers are also allowed to provide in-house yield data. School food authorities shall measure the contents of fruit cups to ensure they obtain the same volume measurements declared by the manufacturers. Reference the [Tips for Accepting Processed Product Documentation PDF](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/tipsheet_processedproduct.pdf) on the Menu Planning webpage for steps to verifying the accuracy of information on a PFS (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/tipsheet_processedproduct.pdf).

In-house Yield

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the School Food Authority's (SFAs) next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yields from a product than what is specified in the Food Buying Guide (FBG). Additionally, an in-house yield study may be used for food items or sizes that are not currently listed in the FBG (e.g. 95 to 110 count pears). [In-house Yield Study Procedures](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) are available on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

School Breakfast Program (SBP)

Dietary Specifications

While not enforced at this time, the weekly maximum for grains at breakfast was exceeded by 12 ounce equivalents (oz eq). Staying within range of the dietary specifications (i.e. calories, saturated fat, sodium, trans fat) while exceeding the weekly maximums poses a significant challenge. Notably, several hot entrée choices at breakfast are leftover entrees from the previous lunch meal service. These menu items, such as chicken patty on a bun (648 milligrams [mg]), chicken or cheese quesadilla (700 mg), and cheeseburger on

a bun (693 mg), exceed the dietary specifications for sodium for the K-12 age/grade group (≤ 540 mg). Furthermore, students who select duplicate cold entrée choices, such as mini donuts (540 to 640 calories), banana or cocoa breads (560 or 540 calories), and Benefit bars (560 to 580 calories) exceed the dietary specifications for calories for the K-12 age/grade group (450 to 500 calories). Neither of these scenarios accounts for the dietary specifications of 1 cup of fruit or 1 cup of milk, which must also be offered daily at breakfast.

Weekly Juice Limit

No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. This limit applies separately to breakfast and lunch. Total volume of pureed fruit, such as Dole Fruitocracy, must be counted as juice towards daily and weekly fruit requirements.

Portion Control

Using tools correctly is an important aspect of portion control. The correct way to portion food is to use a level scoop, which means the item is served as planned. Heaping scoops provide excess calories and nutrients and increase food cost, as more food is required to serve the same number of students. Food shortages may result. Conversely, scant scoops provide component shortages per portion and inadequate calories and nutrients. Excessive leftovers or food waste may result.

Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e. the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches children good eating habits by demonstrating and providing appropriate portion sizes of each food group at a meal. Proper portion control also ensures a reimbursable meal is served, so students receive the planned quantity of the food component (e.g. 2.0 oz eq of grain) or nutrients. Food costs are controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase.

To ensure that students receive appropriate amounts of meat/meat alternate, weigh the meat/meat alternate, then determine which scoop will hold that weight of meat.

Signage

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

If you are interested in ordering signage from SNT, please visit the [Team Nutrition webpage](https://dpi.wi.gov/team-nutrition) and complete the Resource Order Form, under the Resources heading (https://dpi.wi.gov/team-nutrition).

Consider adding signage to the meal service line, like the SNT [Salad Bar Signage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx), showing students how many pieces of fruits and/or vegetables to select based on the planned portion size(s)

(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. The current breakfast and lunch production record templates do not meet the production record requirements per the "[Must Haves and Nice to Haves](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf)" list

(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).

Production records submitted for the review period were not filled in completely nor consistently.

The following information must be corrected on the breakfast production record to meet the production record requirements:

- Serving site
- Grade grouping(s)
- Planned serving size for each grade group and adults

- Planned/actual quantity prepared in purchase units
- Planned serving size for condiments
- Number of reimbursable and non-reimbursable (adult) meals planned and served
- Substitutions made for students with special dietary needs

The following information must be corrected on the lunch production record to meet the production record requirements:

- Serving site
- Menu type
- Planned serving size for each grade group and adults
- Planned/actual number of servings prepared
- Planned/actual quantity prepared in purchase units
- Planned serving size for condiments
- Substitutions made for students with special dietary needs

While there is no required production record template, there are some examples that may be used on the [Production Records webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

Be specific about the identity, brand, and description of the items served. Instead of “chicken patty,” “spaghetti noodles,” or “pizza,” list the specific type. Those descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records to accurately reflect portion sizes and crediting.

Planned portion sizes are required for every meal component and menu item, including condiments. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Use volume measures (such as cups) to record portion sizes of fruits, vegetables, and milk, and use weight measures (such as ounces or grams) to record portion sizes of meat/meat alternates (m/ma) and grains. Fruit sizes (e.g. case count) should also be recorded.

Offer versus Serve (OVS)

During breakfast meal observation and through conversation with the Food Service Director, OVS was identified as an area of opportunity for the Child Nutrition Programs at Rio Community School District. School nutrition professionals and students will benefit from additional OVS training in the context of the district’s breakfast and lunch menus. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) and the [Offer Versus Serve webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) may be used as training resources (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf, https://dpi.wi.gov/school-nutrition/training/webcasts). Additionally, [Meal or No Meal](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx), a training resource inspired by a game show, may be used for staff determining reimbursable meals (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx).

Extras

Extra, non-creditable items do not credit toward the meal pattern but must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra, non-creditable items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extras are frequently served. These foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal.

Corrective Action

Meal Pattern Finding #1: Current breakfast and lunch production records do not include all required information.

Required Corrective Action: Update production records to include the following missing and/or incomplete information: serving site; grade grouping(s) (breakfast only); menu type (lunch only); planned

serving size for each grade group and adults; planned/actual number of servings prepared (lunch only); planned/actual quantity prepared in purchase units; planned serving size for condiments; number of reimbursable and non-reimbursable (adult) meals planned and served (breakfast only); and substitutions made for students with special dietary needs. **Please submit three full days of completed production records, updated to reflect these requirements.** Select production records you are confident are filled in accurately and completely.

Meal Pattern Finding #2: School nutrition professionals will benefit from additional training on OVS.

Required Corrective Action: Watch the [Offer Versus Serve webcast](https://dpi.wi.gov/schoolnutrition/training/webcasts#ovs) (<https://dpi.wi.gov/schoolnutrition/training/webcasts#ovs>) on the SNT [Training webpage](https://dpi.wi.gov/school-nutrition/training) (<https://dpi.wi.gov/school-nutrition/training>) or comparable training with prior approval from the Public Health Nutritionist. Submit certificates of completion for the Food Service Director and for school nutrition professionals who determine reimbursable meals at the point of service (POS).

Meal Pattern Finding #3: The required 1/2 cup fruit and/or vegetable, or a combination, statement is missing from signage.

Required Corrective Action: Add a statement to your current signage which explains a student must select at least 1/2 cup fruit and/or vegetable, or a combination, as part of his or her reimbursable meal.

Submit a photo of updated signage.

Meal Pattern Finding #4: Signage was not posted at breakfast to show students what constitutes a reimbursable meal.

Required Corrective Action: Submit a photo of signage posted at breakfast, which includes the required 1/2 cup fruit, vegetable, or fruit vegetable combination statement

Meal Pattern Finding #5: A total of 5 cups of fruit, including whole fruit and juice, were offered to students over the course of the week, with 5 cups of that as juice. This exceeded the weekly juice limit at breakfast of 50 percent of the total fruit offering (100 percent of the total fruit offering).

Required Corrective Action: Submit one to three sentences explaining what will be done to the week of review so that no more than 50 percent of fruit offerings are in the form of juice at breakfast over the course of the week.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Technical Assistance (TA)/Compliance Reminders

The Business Manager has a good understanding of the management of the non-profit foodservice account including allowable costs.

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>). The Special Milk Program should have the milk cost recorded in the expenses category. Also, it is likely Non-Program Foods would have purchased services expenses.
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- USDA requires that the Unpaid Meal Charge Policy must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school district during the school year. It is best practice to send this information with free/reduced information to ensure the policy is provided to every household.
- 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](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- **Finding:** The Annual Financial Report does not have any expenses allocated to the Special Milk Program and no purchased services allocated to non-program foods.
Corrective Action Needed: Please provide a statement that going forward, expenses will be allocated to the Special Milk Program and purchased services will be allocated to non-program foods if applicable.

Paid Lunch Equity (PLE)

Commendations

- Great job running this tool! Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. Using the USDA calculator along with the annual financial report, the SFA is compliant in non-program foods. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website aids in calculating individual prices of nonprogram foods. DPI recommends using this calculator for a more detailed look at non-program foods for a financially viable operation.

Adult Meals

- Adult meals are considered non-program foods. Food service programs must ensure student reimbursements are not being used to subsidize adult meals.

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- **Finding:** The SFA is following the minimum pricing guidelines in Food Nutrition Services Instruction 782-5; however, adults are being served larger portions than students. The adult meal cost should be the same as the highest student meal cost (ie. Grade 9-12); therefore, needs to be the same serving size.

Corrective Action Needed: Please provide a statement that this practice will be discontinued.

4. GENERAL PROGRAM COMPLIANCE

Local Wellness Policy

Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)

- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

Findings and Corrective Action Needed: Local Wellness Policy

- **Finding: SFA does not have a district wide Local Wellness Policy** that meets the Child Nutrition and WIC Reauthorization of 2004 and further requirements of HHFKA of 2010.
Corrective Action Required: Please provide a timeline for development and estimated completion time of a district wide wellness policy.

Smart Snacks in Schools

At the time of the on-site review there were no competitive foods or beverages sold in vending machines, school stores, snack or coffee bars, concession stands, or fundraisers at Rio High School during the school day. The school day is defined as 12 AM on the day of instruction to 30 minutes after the end of the official school day. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [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).

Professional Standards

Commendations/Technical Assistance (TA)

- Great job to all staff for completing professional standards training requirements each year and for tracking these trainings. It is evident the food service director has attended trainings in various areas.
- Check out the [Training](https://dpi.wi.gov/school-nutrition/training) page on our website for information on our GOALS program and our School Nutrition Skills Development Courses (SNSDC) held during the summer (https://dpi.wi.gov/school-nutrition/training).

Food Safety Plans

- The Food Safety Plan was available for review. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date. Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, employee reporting agreements. The storage areas were reviewed and were clean and well organized.

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (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.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°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 TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action Needed: Food Safety Plans

- **Finding:** There are foods that are using ‘[Time as Public Health Control](#)’; however, the food safety plan does not contain a standard operating procedure for this.
Corrective Action Needed: Submit a statement that you have added this to your food safety plan and submit a sign off sheet that you have trained school nutrition staff on this procedure.

Buy American

For domestic products without country of origin labeling (COOL), consider the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the [Buy American Provision webpage](#) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

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

- Mixed peppers from Mexico
- Cucumbers from Mexico
- Cantaloupe from Guatemala
- Canned olives from Spain
- Olive oil from Spain, Tunisia, Italy, Turkey, and Morocco

Required Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor’s website. **Provide a copy of the form(s) that will be used and include any noncompliant products.**

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

Commendations/Technical Assistance (TA)/Compliance Reminders

School Breakfast Program

- Continue to promote participation in the School Breakfast Program with fun menus or promotions.
- 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.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Rio Community School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

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

Findings and Corrective Action: SBP and SFSP Outreach

- **Finding #1:** No Summer Meals outreach has been done.
Corrective Action Needed: Please submit a plan for Summer Meals outreach for the 2019 summer months.

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The Special Milk Program is offered to one afternoon early learning class. The foodservice director has monitored the program including food safety and counting claiming and has made changes as necessary.

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

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

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



With School Nutrition Programs!