

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Southern Door School Dist. Agency Code: 155457

School(s) Reviewed: High School

Review Date(s): 11/6, 11/7, 11/8, 2018

Date of Exit Conference: 11/8/18

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:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).

- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives:

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

The DPI review team appreciates the eagerness of the staff at Southern Door 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, service, and local wellness, etc. We were impressed during meal service that the servers and director were very interactive with all the students.

The DPI review team is confident that Southern Door will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

420 applications were reviewed, and 2 errors found.

Commendations/Comments/Technical Assistance/Compliance Reminders

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.

- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
 - When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically. If done through software, please check that the income levels are updated each year after July 1.
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>).

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

Other Source Categorical

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

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete [applications](#) containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding: One application was incomplete without a required signature from the determining official. This application was also determined incorrectly, as Free, but should have been Reduced.

- **Corrective Action Needed:** Submit a signed statement of understanding that you have watched the webcast on the DPI website as to completing applications. The link is below. [Free and Reduced-Price Meal Application \(Application with CEP language removed\) \(Spanish\) \(Hmong\)](#)

Please see our short webcast for instructions on how to fill out an application, available in both **English and Spanish:** [Filling out the Household Application for Free and Reduced Price School Meals.](#)

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.

- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Meal Counting and Claiming

□ Finding: The finding was 3 incomplete meals (entrée salads) that were missing enough of one component. These meals did not meet the crediting requirements for a reimbursable meal due to the lack of an update on two recipes from Aviands.

Corrective Action Needed: One recipe was fixed on site, no further action needed. The other recipe is in process of being corrected through the PHN with this review. See corrective action in the section below.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director for sending all documentation ahead of time and being quick to respond to questions. The nutrition professionals were positive, enthusiastic, friendly, personable, and worked well with the students. Thank you also to the kitchen staff at Southern Door High School for doing a great job preparing and serving nutritious, tasty meals to students. Offering so many fresh fruit and veggie options on the nutrition bar is wonderful to see. Students took a variety of these foods, which encourages healthy, lifelong eating habits.

Comments/Technical Assistance/Compliance Reminders

Breakfast

The School Breakfast Program is a great way to start a successful day. According to Food Research and Action Center [FRAC](http://www.frac.org) efforts to increase breakfast participation pay off, school breakfast leads to reduced food insecurity, better test scores, improved student health, and fewer distractions in the classroom. (<http://www.frac.org/wp-content/uploads/school-breakfast-scorecard-sy-2016-2017.pdf>). Each year this organization puts out a school breakfast score card, Wisconsin ranks 36th for the percentage of free and reduced price meal eligible students participating in breakfast of those participating in lunch (Wisconsin ranked 35th in the 2015-16 school year).

The Wisconsin DPI website has provided tools for schools to utilize in creating and promoting [School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program) (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>). The following are handouts that have been well received by students, faculty, and administration.

- [Mid-morning Nutrition Break](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_mmnbn.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_mmnbn.pdf)
- [Grab n' Go Breakfast](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_gng.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sb_gng.pdf)
- [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/bic-toolkit.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/bic-toolkit.pdf)

The 2018-19 **Wisconsin School Breakfast Challenge** has just been announced. The Wisconsin Department of Public Instruction (DPI) School Nutrition Team is partnering with Hunger Task Force (HTF) and Share Our Strength's No Kid Hungry (NKH) to promote breakfast in Wisconsin schools through the Wisconsin School Breakfast Challenge. The challenge begins December 1, 2018 and ends February 28, 2019. Schools across Wisconsin are invited to compete for prizes and recognition by increasing participation in their school breakfast program, or to start a new program if they do not already have one. As student participation grows, so do the chances for winning! Not only is there opportunity to win prizes, but *all participating schools* are eligible to apply for NKH's breakfast grants, totaling \$30,000. For these grants, there is no free and/or reduced price meal percentage requirement.

The USDA has created a [School Breakfast toolkit](https://www.fns.usda.gov/sbp/toolkit) entitled *Energize Your Day with School Breakfast* (https://www.fns.usda.gov/sbp/toolkit).

Afterschool Snack Program

The National School Lunch Program (NSLP) offers reimbursement to help schools serve snacks to children after their regular school day ends. Afterschool snacks give children a nutritional boost and draw them into supervised activities that are safe, fun and filled with learning opportunities. In the [Afterschool Snack Program](#), participating students are claimed by eligibility category (free, reduced, or paid) when a reimbursable snack is selected. (https://dpi.wi.gov/school-nutrition/after-school).

Grant Opportunities

While some deadlines have passed for this school year, additional [grant opportunities](#) for the next school year are rapidly approaching (https://dpi.wi.gov/school-nutrition/grant-opportunities). Currently the website lists many opportunities including breakfast grants, equipment grants, farm to school grants, fruit and vegetable grants, school garden grants, as well as many other grants.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Standardized Recipes

Recipes should be updated to reflect current practices and products. Standardized recipes exist, but may not be accurately reflecting what is happening in the kitchen. Guidance on what a standardized recipe should include can be found on [Recipe Resources and Tools webpage](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

The Food Service Management Company (FSMC) has supplied the Food Service Director with recipes that do not accurately reflect the products being used. Crediting recipes properly for high school students appears to have fallen short.

❑ **Finding:** Two entree salads do not credit properly for high school students. Students in high school (9th -12th grade) are required to be offered 2 oz eq meat/meat alternate daily at lunch to meet the meal pattern requirements set by USDA.

1. Chef Salad with turkey and bread sticks
 - a. Recipe states 0.5 oz slice, 3 slices = 1 oz eq m/ma
 - b. Distributor sheet indicates 0.67 oz slice, 3 slices (2 oz) = 0.75 oz eq m/ma
 - c. Salad as made is currently short 0.25 oz eq m/ma
2. Caesar Salad with chicken and breadsticks
 - a. Recipe states 1.25oz chicken fajita strips = 1 oz eq m/ma
 - b. USDA foods sheet indicates 1.7 oz of product = 1 oz eq m/ma
 - c. Salad as made is currently short 0.5 oz eq m/m
 - d. **Corrected on site, no further action required**

If a student chooses this entree option daily the student will be short meat/meat alternate each day and for the week.

Corrective Action Needed: It is recommended that all standardized recipes be reviewed at least twice each year and as new products are received to ensure proper crediting for all students. Please update the entree salad recipe (Chef Salad with turkey and bread sticks). Submit this recipe to the PHN who conducted the review.

SMART SNACKS

Commendations

Thank you for spending the time and assuring the items stocked in the FSD's vending machines are Smart Snack compliant and the documentation provided by the high school principal is thorough and well maintained, good job!

Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. [Smart Snacks in a nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) is a clear concise sheet with information. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf>).

Schools agree to comply with the regulations set forth by USDA when they choose to participate in the child nutrition programs; willful noncompliance of regulations can result in the loss of federal funding. If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group.

It is recommended that the Alliance for a Healthier Generation Smart Snacks Product [Calculator](#) is used and can be found on the Smart Snacks webpage to assess product compliance (<https://foodplanner.healthiergeneration.org/calculator/>). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records. The USDA has an update Smart Snacks [Guide](#) for schools to help answer questions and understand compliance (https://fnsprod.azureedge.net/sites/default/files/tn/508_USDASmartSnacks_508_82218.pdf)

Findings and Corrective Action Needed: Smart Snacks

❑ Finding: The FFA (Future Farmers of America) maintain a vending machine in the cafeteria area stocked with 16 oz dairy milk products, including whole chocolate milk. Whole milk is not Smart Snack Complaint and 16 oz is not an allowable size. Currently 1% chocolate milk is allowable for all students, and high school students are allowed to have milk products < 12 fl oz.

Corrective Action Needed: Submit a statement to the PHN describing how this machine will be brought into compliance.

Buy American

Before the Procurement Review (PR) was created, the Administrative Review (AR) contained a list of questions intended to assess if a school incorporated adequate competition when awarding contracts that were funded through tax-payer dollars. It was later determined by the USDA that a more in-depth look at this process should be implemented in order to effectively determine if adequate competition existed. This resulted in the development of the PR. Subsequently, The AR and the PR are completely separate reviews and follow completely separate review cycles. Here's a link to the [Procurement Review](#) webpage where you can download the PR Form (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/review-process>). This PR Form is our primary way of obtaining the appropriate information and documentation needed to complete the PR.

If you have more specific questions regarding the PR, or if you'd like clarification on parts of the Procurement Review Form, feel free to contact [Alex Zitske](#) directly (alex.zitske@dpi.wi.gov).

The following information must be recorded on a 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 distribution 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 [Buy American - Noncompliant Product List template](#) can be found on the Buy American webpage, under Buy American Resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

❑ Finding: documentation not currently being kept pertaining to products not in compliance with the Buy American provisions.

Corrective Action Needed: Please create or use the template found on the DPI Procurement page to establish a record of products currently received that are not compliant. Please complete one form for each of the products listed below and send to the PHN:

- Arrezia canned mushrooms – product of the Netherlands
- Cucumbers – product of Mexico

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Great job running this tool! The SFA's current weighted average for 2018-19 SY tool is \$2.92.
- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the [PLE 'In a Nutshell'](#) for more information on the PLE tool.
- Refer to the most recent [memo](#) from DPI.
- Refer to the most recent [guidance memo](#) from USDA.
- Step by step instructions to completing the PLE tool can be found on our [financial website](#) under Paid Lunch Equity.

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 [16-17 Annual Financial Report instructions](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instr>

- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”. While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “nonprogram foods”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
 - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

FSMC

- Because of the Nonprogram Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all placed into Purchased Services as was previously done for SFAs with FSMC contracts.
- SFAs must annually be provided information on food costs and revenues from Food Service Management Companies (FSMC). The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements.
- **❑ Finding:** On the Annual Financial Report, the revenues and expenses were not broken out by category and were recorded in Purchased Services.

Corrective Action Needed: Please provide a statement going forward that all expenses and revenues will be broken out from NSLP and allocated to the correct line on the annual financial report. We have a resource on our website to aid you in this calculation.

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

The Non-Program Food Tool was completed and a copy given to the auditor on review.

Indirect Costs

There are no indirect costs.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Civil Rights training has been completed for all Food Service Staff annually and documented on the Professional Standards tracking tool.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (As applicable)

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

□ Finding: The Public Release was not distributed in a timely manner due to a change in personnel at the district office. The new executive assistant was not aware of this. She did, however send it out in October. We discussed it at the time of this report during the Administrative Review, and going forward she will send out the Public Release after July 1. Technical assistance was given to complete the Public Release distribution after July 1. Keep all documentation per the record retention requirement.

Corrective Action Needed: Please submit a statement to show that you have read the calendar of requirements and will complete the Public Release requirement after July 1, 2019.

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of

review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.

Food Service Management Company (FSMC)

The following duties may not be delegated to the FSMC:

- Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year. It is due February 1 annually and the documents are kept onsite.
- Signature Authority – a representative of the SFA must sign off on the contracts for the SFA
- Edit Checks- an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software.
- On-site monitoring is being done correctly and documented.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

The Wellness Policy for Southern Door was very well done and contained all the required language. Keep up the good work and remember to update annually.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, 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.

The Food Service Director has done a great job of providing, monitoring, and tracking training for his staff annually. Keep up the good work!

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

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

Water is readily available inside the cafeteria via a water fountain/bubbler.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

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

The Health Inspection Reports were posted out in the cafeteria where it could be viewed by all.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, dishmachine temps, food temps are being logged daily and up to date.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

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

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snack Program

Commendations/Comments/Technical Assistance/Compliance Reminders

Currently there is not an Afterschool Snack Program at Southern Door School District.

Summer 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 not operated at Southern Door, 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

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5th grade.
- Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one.
- Per the Agreement for the WSDMP in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and perhaps include that stipulation in the SFA’s milk bid.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

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

