

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

School Food Authority: Colfax School District

Agency Code: 171176

School(s) Reviewed: Colfax Elementary School

Date of Exit Conference: 2/21/2019

Review Date(s): February 19 and 21, 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 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 Colfax 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. Everyone was 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. All is much appreciated.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

All applications were reviewed as consultant deemed necessary due to concerns with incomplete and incorrect applications.

Certification and Benefit Issuance

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 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.

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.

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.

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 the 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. 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.

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.

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.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ **Finding #1:** Upon reviewing the sample pool of applications, it was found that many of the applications had missing information or unclear information such as household box, income information on back of app.

Corrective Action Required #1: Watch the [Processing Applications webcast](https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html). Submit a signed statement that you have watched and understand the process.

Corrective Action Required #2: Watch the [Special Situations webcast](https://media.dpi.wi.gov/school-nutrition/special-situations-in-free-reduced/story.html) (https://media.dpi.wi.gov/school-nutrition/special-situations-in-free-reduced/story.html). Also watch the [webcast for filling out the household application](https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story_html5.html). These are both short webcasts. Submit a signed statement that you have watched and understand the process.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders Findings and Corrective Action Needed: Verification

❑ **Technical Assistance Provided:** It was observed on the VCR that Colfax School district used the Standard Selection process for the 2018-19 school year report. They could have used Alternate #1 process. Assistance was given to them for the next school year, the Alternate #1 process can be used, and they don't need to do error prone applications.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- The meal counting and claim for the Review Month was conducted perfectly.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

There were no errors found in counting and claiming.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

We extend sincere appreciation to the nutrition staff at Colfax for their cooperation and flexibility with the inclement weather. Thank you for the warm welcome to your building. Service staff members were friendly, eager to learn, and kind to students. The cafeteria environment was relaxing. It was great to see that students were given sufficient time to eat meals. The meals we ate were colorful, warm, tasty, and filling.

Comments/Technical Assistance/Compliance Reminders

Training: Regular trainings are offered on the Wisconsin Department of Public Instruction (DPI) webpage as webcasts, webinars, and on-site trainings. Check our [Training](https://dpi.wi.gov/school-nutrition/training) webpage often for current and upcoming opportunities (<https://dpi.wi.gov/school-nutrition/training>). Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](https://dpi.wi.gov/school-nutrition/directory) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>). Please reach out with any questions in the future.

Crediting documentation: Any processed product that is not listed in the USDA *Food Buying Guide* for Child Nutrition Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to credit toward the meal pattern. A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for Child Nutrition Programs, it may not be credited when served as part of the USDA School Meal Programs. Current crediting information must be available onsite where meals are served. SNT recommends maintaining and organizing this information in a manner that is easy to reference and update, such as a binder, file folders divided into categories, or organized as digital files. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

Production records: Production records are intended to be useful tools to record information prior to production, during production, and following production. The production record template currently in use is out of date and uses language that is not currently applicable (e.g., Traditional Menu Planning). There is also missing information, such as total number of purchase units prepared, planned serving size and usage for condiments). Additionally, information for fruit was not recorded or lunch on 1/8. While there is no required production record template, there are some examples that may be used on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Resources: Please visit the [DPI School Nutrition Webpage](https://dpi.wi.gov/school-nutrition) often to receive helpful resources and important information (<https://dpi.wi.gov/school-nutrition>). The following were discussed and provided on site

- [Buy American Non-compliant Product List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>)
- [Standardized recipe template](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>)
- [Breakfast](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf) and [Lunch](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) meal pattern tables (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>)
- [Breakfast](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-in-a-nutshell.pdf) and [Lunch](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf) In a Nutshell (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-in-a-nutshell.pdf>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>)

- [Crediting In a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf)
- [Vegetable Subgroups](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf)
- [Fruit and Vegetable ½ cup crediting](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf)
- [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf)
- [Breakfast and lunch production records](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)
- [Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf)
- [CACFP Meal Pattern](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf) (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf)
- [CACFP compliant cereals](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cereals-CACFP-text.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cereals-CACFP-text.pdf)
- [Determining CACFP compliance for cereal and yogurt](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sugar-in-yogurt-and-cereal.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sugar-in-yogurt-and-cereal.pdf)

TA for COLFAX HIGH SCHOOL (NOT A REVIEW SITE)

Seconds: Discontinue the practice of offering second servings free of charge to students. Offering second servings complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly averages. If students are still hungry, second servings may be sold a la carte. Side dishes can also be sold a la carte if they meet Smart Snacks standards.

Garden/salad bar: Produce on a garden bar can credit toward the meal pattern each day that it is offered to students (e.g., if black beans are offered daily with a planned serving size of 1/8 cup, then 5/8 cup has been offered in total each week and meets the minimum ½ cup requirement of beans/peas). Even with garden bars, the menu planner must plan a specific portion size that he or she intends students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as ½ of the volume served.

Additional signage on a salad or garden bar can assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) with pictures that can be posted on a salad or garden bar (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).

A salad bar has the potential to provide a reimbursable meal (access to milk, fruit, vegetable, meat/meat alternate, and grains, which are all offered at the salad bar) whereas a garden bar offers only fruit and vegetable.

Production records must be kept for a garden or salad bar. Production record templates for garden bars and salad bars are available on the [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage, under the Other Resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Fruit: Per the lunch meal pattern students in grades 9-12 must be offered 1 cup of fruit. This means that a high school student must have access to 1 cup of fruit. The planned amount of fruit for high school students was ½ cup on occasion during the week of review.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

****Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.**

BREAKFAST MEAL PATTERN

****☐ Finding #1: daily and weekly grain shortage**

During the week of review a ½ oz eq granola bar was offered. No other source of grain was offered at that meal. Per the breakfast meal pattern, 1 oz eq grain must be offered daily and 9 oz eq grain must be offered weekly. Only 7.5 oz eq grain was offered during the week of review.

- Monday: 1 oz eq grain Cocoa Cherry Bar = 1 oz eq grain
- Tuesday: 1 oz eq grain Bug Bites = 1 oz eq grain
- Wednesday: ½ oz eq grain granola bar = **½ oz eq grain**
- Thursday: 1.5 oz eq grain and 1 oz eq M/MA from pizza = 2.5 oz eq grain
- Friday: 2 oz eq grain Frudel, ½ oz eq M/MA Go-Gurt = 2.5 oz eq grain
- TOTAL: **7.5 oz eq grain**

Corrective Action Needed for Finding #1: Submit a completed [breakfast menu planning worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx) for week #2 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx>).

****☐ Finding #2: daily and weekly fruit shortage**

Per the K-12 breakfast meal pattern, 1 cup of fruit must be offered daily and 5 cups must be offered weekly. The following fruit options were offered during the week of review:

- Monday: ½ cup fruit cup, ½ cup juice = 1c
- Tuesday: ½ cup oranges = **½c**
 - Please note that the fruit snacks offered do not credit as fruit
- Wednesday: ½ cup apple slices, ½ cup juice = 1c
- Thursday: ½ cup banana, ½ cup juice = 1c
- Friday: ½ cup raisins, ½ cup juice = 1c
- TOTAL: **4.5c fruit**

Corrective Action Needed for Finding #2: Verified upon submission of Corrective Action Needed for Finding #1.

☐ Finding #3: less than 4 items offered

An item at breakfast is defined as 1.0 oz eq grain, 1.0 oz eq meat/meat alternate, ½ cup of fruit and/or vegetable, or 1 cup of milk. Under Offer versus Serve at breakfast, four food items must be

offered and students must select at least three food items, one of which is ½ cup fruit and/or vegetable to have a reimbursable meal. The following meals offered less than 4 items

- Tuesday: ½ cup oranges (1 item), fruit snacks (does not credit), bug bites (1 item), and milk (1 item)= 3 items
- Wednesday: ½ cup apple (1 item), 4 fl oz juice (1 item), granola bar (not a full item), and milk (1 item)= 3 items
- NOTE: It is up to the menu planner to determine how many items a multiple oz eq grain item is counted as at breakfast. For example, the menu planner can decide if the 2 oz eq grain Frudel counts as 1 or 2 items at breakfast.

Corrective Action Needed for Finding #3: Verified upon submission of Corrective Action Needed for Finding #1.

LUNCH MEAL PATTERN

****☐ Finding #4: daily vegetable shortage**

Per the K-12 lunch meal pattern, ¾ cup of vegetables must be offered daily. The following vegetables were offered on 1/11, resulting in a daily shortage:

- ½ cup green beans = ½ c vegetable
- ¼ cup romaine mix = 1/8 c vegetable
- TOTAL= **5/8 c vegetable**

This is a repeat finding from the 2015 AR and subject to fiscal action:
*The following requirements were not met for lunch: whole grain-rich, fruit, **daily vegetable**, red/orange and dark green vegetable subgroups. The results were provided to the SFA with recommendations to bring all areas into compliance.*

Corrective Action Needed for Finding #4: Submit a completed [lunch menu planning worksheet](#) that show the changes that will be made the next time week of review is offered (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools>).

****☐ Finding #5: weekly starchy vegetable subgroup shortage**

Per the K-12 lunch meal pattern, ½ cup of starchy vegetables must be offered weekly. During the week of review only ¼ cup of starchy vegetable (corn on 1/8) was offered. This results in a weekly starchy subgroup shortage.

Corrective Action Needed for Finding #5: Verified upon submission of Corrective Action Needed for Finding #4.

****☐ Finding #6: Vegetable portions**

Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Cold vegetables served during the onsite review (carrots, celery, broccoli) were either self-served by students or “eyeballed” and served by staff. Students did select a sufficient amount of fruit and/or vegetable to make a reimbursable meal. However, neither method guarantees that students are offered the required amount (¾ cup total vegetable) or are selecting the requirement for a reimbursable

meal (1/2 cup fruit and/or vegetables). Consider utilizing [fresh fruit and vegetable signage](#) to communicate planned portion sizes with students, service staff, and staff at POS (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

Corrective Action Needed for Finding #6: Submit a written statement explaining how portion sizes will be communicated daily to students, service staff, and staff at POS. If signage is utilized please submit a photo of the signage in the serving line.

CACFP MEAL PATTERN

❑ Finding #7: Junior kindergarten students neither co-mingled with K-12 students or following the CACFP meal pattern

Students not yet in kindergarten who are served meals separately from K-12 students must follow the CACFP meal pattern. The junior kindergarten students at Colfax Elementary School were served separately from K-12 students, but did not follow the CACFP meal pattern. The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

The following CACFP non-compliant findings were noted:

- The Go-Gurt served on 1/11 contains too much sugar (8 grams of sugar per 2 ounces)
- Junior kindergarten students have access to chocolate milk. Flavored milk is not allowed for students not yet in kindergarten who are served meals separately from K-12 students. These students can only be served fat-free (skim) and low-fat (1 percent) unflavored milk.
- Students not yet in kindergarten who are served meals separately from K-12 students may either be served the full amount of all components or be served family style. Offer versus serve is not allowable in the CACFP meal pattern.
- Students were served Colossal Crunch cereal on 2/21, which contains 12g sugar per ounce. The sugar limit for cereal is 6g sugar per ounce.

Corrective Action Needed for Finding #7: Submit a written plan of action for implementing the CACFP meal pattern OR comingling students. If you chose to implement the CACFP meal pattern, review slides from the [CACFP meal pattern training](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/infant-preschool-meal-pattern-training.pdf>). Submit a sign-in roster from the training. If you chose to begin comingling junior kindergarten and K-12 students, submit a written plan of action for altering service times. Please contact [Tanya Kirtz](#) with any questions regarding the serving infants and children (Tanya.Kirtz@dpi.wi.gov).

GENERAL MEAL PATTERN COMPLIANCE

❑ Finding #8: Non whole grain rich grains

All grains offered and credited in school meal programs are required to be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Replace all enriched grain products with whole grain-rich versions. USDA has a very thorough [Whole Grain Resource](#) that provides tools and tips for identifying whole grain-rich products (<https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

The following items were found to not be whole grain rich (please note, this is not an exhaustive review of all products in storage):

- Jumbo pretzel (offered at lunch during week of review)
- English muffin (offered at breakfast to 4-12 students during week of review)
- Bagel (offered at breakfast to 4-12 students during week of review)
- Poptarts (HS storage)
- Croutons (HS storage)
- Cake mixes (HS storage)
- Enriched Italian pasta (HS storage)
- Macaroni elbows (HS storage)
- Malt-O Meal Cereal (HS storage)
 - Colossal Crunch
 - Apple Zings

Corrective Action Needed for Finding #8: View the [Grains webcast](#) (<https://dpi.wi.gov/school-nutrition/training/webcasts#grains>). Submit a sign-in roster for all staff that view. Submit a written statement that these products will no longer be used in the National School Lunch or Breakfast Program. Submit nutrition facts for substitute items selected.

❑ Finding #9: Second portions and OVS

Colfax School District allows for second entrees to be purchased- this is acceptable. However during the onsite review, it was observed that students who did not select the entrée (meat/meat alternate and/or grain) the first time they came through the line were allowed to come back through the line a second time and select the entrée along with seconds of fruits and vegetables. These students were not charged a la carte for these items. This practice must be discontinued.

Under Offer versus Serve (OVS) students have the flexibility to select all or decline some components and make a reimbursable meal during their first trip through the line prior to the POS. Second trips through the line for entrees (meat/meat alternate and/or grain) or milks must be purchased regardless as to what components the student selected during their first trip through the line.

It is allowable for schools to give away seconds of fruits or vegetables, but it is advised to do so with dietary specifications and cost in mind (ex., potato products, juice, packaged items). It is also allowable to charge students a la carte for additional offerings of fruits and vegetables beyond the daily requirement, if desired. The cafeteria is a classroom where students learn healthy habits. Staff should encourage students to select a balanced reimbursable meal, selecting only as much as they plan to eat. During the day of onsite review students were coming through the line for seconds of hash browns and applesauce cups. These items were both popular with students. Some students were seen only eating the hash browns or applesauce and immediately returning for

more. Staff should educate and encourage students to consume a variety of components and be mindful of their food waste prior to requesting seconds.

Food service staff were somewhat unclear about the OVS requirements. Although nearly all students observed took a reimbursable meal, it is important for staff to fully understand the OVS requirements. 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) can 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).

During the onsite review a significant amount of food waste was noted when students emptied their trays. This may root from the systemic issue of students

- a) Being asked to take more food than necessary under OVS
- b) Taking seconds of the sides they like
- c) Being allowed through the line a second time free of charge for things previously declined

Corrective Action Needed for Finding #9: Submit a written statement agreeing that seconds of the entrée (M/MA and/or grain) will no longer be given out free of charge, regardless of the students' selection during their first trip through the meal service line. Submit written explanation about how seconds of fruits and vegetables will be handled. View the [OVS webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (https://dpi.wi.gov/school-nutrition/training/webcasts#ovs). Submit a sign-in roster for all staff that view.

❑ Finding #10: Standardized recipes

Standardized recipes are required for all menu items that have more than one. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). Romaine mix and egg sandwich did not have standardized recipes at the time of review.

Corrective Action Needed for Finding #10: Submit a standardized recipe for romaine mix and egg sandwich.

❑ Finding #11: Non-reimbursable meals observed

On 2/19 one student selected a non-reimbursable meal consisting of

- 1 potato (1/4c) and 2 celery sticks (undetermined amount)= minimum ¼ cup vegetable
- 1 applesauce (1/2c) and 1 juice (1/2 c)= 1 cup fruit

Only two components were selected and even at that the vegetable component could not determined to equal ½ cup. Staff did not send the student back to make a reimbursable meal.

As a reminder, the school must OFFER the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal. Students must SELECT at least three full, different, food components, one of which is ½ cup fruit and/or vegetable.

This non-reimbursable meal was claimed and therefore subject to fiscal action.

Corrective Action Needed for Finding #11: Submit a written statement explaining what will be done to ensure all meals are reimbursable. If training is conducted please submit a sign-in roster and summary of the content presented. If signage is added please submit photo documentation.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at Colfax Elementary School. 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

School Day: The school day is defined as midnight – thirty minutes after the instructional day ends. If the instructional day at Colfax School District ends at 3:18, the defined “school day” is midnight – 3:48p. During this time all food sales must either be compliant or meet the qualifications for an exemption.

Product Compliance: We recommend using the [Alliance for a Healthier Generation Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) 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.

Exemptions: The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented.

Wellness Policy: The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit

fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ Finding #1: No tracking tool utilized

All fundraisers involving the sale of food must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

Corrective Action Needed for Finding #11: Please submit a completed tracking tool for fundraising done during 2018-2019 at Colfax Elementary. Compliance will be assessed. Submit a summary outlining who will be responsible for oversight of Smart Snack regulations within Ithaca School District. Please address how current food and beverages not meeting Smart Snack standards will be made to comply with these regulations. Use the [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) to review the guidelines (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf>).

BUY AMERICAN

Comments/Technical Assistance/Compliance Reminders

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products.

The Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the [SNT Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

❑ Finding #1: Non-compliant items

The following non-domestic products were found in storage and did not have tracking documentation (please note, this is not an exhaustive review of all products in storage):

- Mandarin Oranges- China
- Pineapple- Thailand
- Fruit cups- Thailand
- Grape tomatoes- Mexico

- Sugar snap peas- Mexico
- Green and red bell peppers- Mexico
- Black olives- Egypt
- Green olives- Spain

Corrective Action Needed for Finding #1: Please submit a copy of completed non-domestic documentation for products identified above, as well as any other products found in inventory. 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** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
 - *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
 - b) **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
 - *Ex. Blueberries are not available domestically during the months of December – June.*
 - c) **Availability** – Product(s) is not available to purchase domestically.
 - *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
 - d) **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
 - *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
 - e) **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
 - f) **Other**- Please provide a written explanation.
 - *Ex. The SFA received a donation of non-domestic oranges*
 - *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american>). For more information

on Buy American exceptions, visit the [Buy American Provision Memos](https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos>).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminder

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and 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 our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- 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”.
- 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” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure 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 a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [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 Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>):
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- 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>).

The Annual Financial Report was done correctly, and no errors were found. No further action needed.

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Paid Lunch Equity

Colfax Elementary school had a positive balance and the breakfast and lunch prices remained the same as the previous school year. Thank you for completing the PLE Survey.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are exempt from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

The [Non-Program Food Tool](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) was not necessary as only adult meals, and extra milks are offered, no ala-carte items (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
 - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

No indirect costs were found.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

A Civil Rights Powerpoint was done district-wide at Colfax School District. A roster was kept with all staff that attended. A copy is kept on file. This also can count as professional standards training hours. Nice job!

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

❑ **Finding:** The Non-Discrimination statement was downsized to fit the page on several documents. This cannot be done. The statement has to be the same size font as the rest of the page, and printed in its entirety. This was discussed and implemented immediately.

Corrective Action/Technical Assistance Given: For the rest of the 2018-10 school year, anytime you use the non-discrimination statement, make it the same size font as the rest of the page and print the complete statement. No further action needed.

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

The On-Site Monitoring was done correctly, and kept on file. No further action needed.

Local Wellness Policy

Commendations/Comments/Technical Assistance/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 2016-2017 and full compliance with the requirements 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 each school complies with the policy.

Thank you for keeping current on your Wellness Policy and reviewing it annually.

Findings and Corrective Action Needed: Local Wellness Policy

❑ **Finding:** The company Neola has assisted the Colfax School District with their Wellness Policy. Although well written, there is some language that needs to be corrected. There are areas that contradict each other. Also, there was no statement that included stakeholders in the policy. I have reviewed changes with the school secretary and marked the them on a copy of their policy. I suggested to use the Wellness Checklist on our DPI website for reference as to language that needs to be in your policy. The office staff person I worked with was going to make the corrections the same day and review them with the Administrator.

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). Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

SFA is required to have a committee of diverse stakeholders and/or a roster of those involved (1003)

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. SFA wellness committees should include a diverse team of committed school and community stakeholders. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.

Technical Assistance: The Wellness Checklist on the DPI website is a very valuable tool in helping with language for the Wellness Policy. A suggestion was made to reference that checklist and compare some of the language in the existing policy to see if it needs correction. The corrections were done on-site. No further action needed.

Professional Standards

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, 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.

Commendations/Comments/Technical Assistance/Compliance Reminders

The DPI tracker is being used for the professional standards training documentation for Food Service Staff and Office Staff that helps with Food Service Reporting. Their training is up to date. No further action needed.

Water

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

Commendations/Comments/Technical Assistance/Compliance Reminders

Water is readily available to all students at no charge.

Food Safety

Commendations/Comments/Technical Assistance/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). While you're at it, visit the [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is 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.

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

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, and sanitizing solution logs were up-to-date.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling

on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.

- 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, and food service staff.

Food Employee Reporting Agreements

- All food handlers must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf).
- All food handlers must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Storage

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

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 this 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.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products

Shell eggs

Meat (beef, pork, and lamb)

Poultry

Fish

Shellfish and crustaceans

Baked potatoes

Heat-treated plant food, such as cooked rice, beans, and vegetables

Tofu or other soy protein

Sprouts and seed sprouts

Sliced melons

Cut tomatoes
Cut leafy greens
Untreated garlic-and-oil mixtures
Synthetic ingredients, such as textured soy protein in meat alternatives

Findings and Corrective Action Needed: Food Safety

□ **Finding:** During the review, it was noticed that both Elementary kitchen and High school kitchen had a food safety binder. However, both binders do not have the proper documents in them. The Food Safety Plan is very important, and should be complete, and reviewed annually. This is a repeat finding from the last AR in 2015.

Corrective Action Required: There are several areas that need attention in the Food Safety area. They are listed below:

1. Milk was observed on the counter for meal service without proper temperature control.
Use Ice- lined barrels or bags, or purchase Ice pillow sheets from your distributor. Place milk on top for meal service.
2. Make an SOP (standard operating procedure) for the Milk and keep in Food Safety Binder.
3. The SFA and Food Safety Plan must have a procedure in place to clean up vomit, and diarrhea . Create an SOP for this procedure and place in binder.
4. Employee Health Agreements were created on site during the Administrative Review, but a copy needs to be in each binder.
5. Thermometer Calibration must be done at least 2x per month and recorded as date, and initials of who calibrated them. Also a written SOP must accompany this as to the procedure of how to calibrate. You may choose the ice water method, or boiling method. Please list which method you are using on the SOP and place in binder.
6. Cleaning and Sanitizing: Quat or Bleach? Quat doesn't negate Norovirus, but bleach does. Quat loses effectiveness and must be remixed often. Create an SOP of your process, and put in binder.
7. Wiping cloths: Recording when you make up your sanitizing solution is a best practice. Create a SOP for your procedure for regularly checking the concentration of sanitizer, to make sure it is strong enough. Place SOP in binder.
8. Place copies of Inspection Reports in binder as well as placing the most recent one out in the cafeteria where the public can view them.
9. Keep your temp logs, (when done with a month) in the food safety binder. Technical assistance was given to use a "thermolabel" sticker at least 2x a month in dish machine to accurately monitor temperatures of sanitizer. Keep sticker on temp log.
10. Have "cooling procedure" in place, and also a SOP. For cooling foods, see the template for Food Safety on DPI website. Create a SOP for your kitchen and place in binder.

11. Remove all non-pertinent SOP's from the Food Safety Binder. Review annually and make changes as needed. You can write on current SOP's, or create new ones if needed.
12. Check to see if SOP's are needed for other areas around the kitchen, such as handwashing, hairnets, etc.
13. The "GOAL" here is for anyone else to look at the binder, and see a procedure listed, and know exactly what to do, because the process is listed here.

When all of these actions have been completed, please send copies of documentation to the consultant at DPI. Also, send a signed statement (can be an email) to the consultant stating that you understand the importance of a Food Safety Binder and why it needs to be kept up to date.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

The ladies in the administration office do most of the Food Service reporting. A great job is being done, and records are retained for 3 yrs plus the current year.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

Summer Food Service is not done at Colfax School District, however they do distribute information to families as required in the packet that goes home with students for summer. It is also posted at the school office.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Remind

The Wisconsin School Day Milk Program is going great. The teachers take the students down to the cafeteria mid morning and the stop at computer first, finger scan, are charged, then proceed to pick up their milk. The POS is fine too. The claim is done once per year. Great job!

"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!