

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

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**School Food Authority:** Elk Mound Area School District      **Agency Code:** 17-1645

**School(s) Reviewed:** Elk Mound High School

**Review Date(s):** 11/26/18-11/27/18

**Date of Exit Conference:** 11/27/18

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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.

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Elk Mound Area School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. 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 for their willingness to make changes to meet school nutrition program regulations. The staff is doing a wonderful job implementing the program regulations to ensure students are receiving nutritious meals throughout the school day.

**REVIEW AREAS**

**1. MEAL ACCESS AND REIMBURSEMENT**

**Certification and Benefit Issuance**

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

- 227 student eligibilities were checked during the review. There were no errors found. Outstanding work done by the Determining Official!

**Disclosure**

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- For any staff that has access to students' individual eligibility status that isn't within the School Nutrition Office (i.e. IT Department, school secretaries) they must sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This is to protect the students from any overt identification. A template [Disclosure of Free and Reduced Price Information](#) form is located on the

SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).
- The household can “self-disclose” by bringing in a copy of their free/reduced approval notice or direct certification approval letter to the designated official operating the outside program. This option removes food service from these types of requests and is preferred. DPI recommends limiting the number of staff members responsible for collecting this data (e.g., one school secretary who has been trained on confidentiality, rather than each athletic coach).

#### **Findings and Corrective Action Needed:**

- Finding:** The Direct Certification Notification Letter had the correct USDA Non-discrimination statement, but it was in the wrong format.

**Corrective Action Needed:** Update the letter within the software system and submit a copy. **Corrected on-site. No further action required.**

#### **Verification**

##### **Technical Assistance (TA)/Compliance Reminders**

- The Confirmation Review only needs to take place for the application(s) chosen for the Verification process, not every application.
- When completing Verification, take the total number of applications and multiply it .03, always rounding up (ex:  $46 \times .03 = 1.38\%$ ; 2 applications would need to be verified).

#### **Meal Counting and Claiming**

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

- When completing the monthly claims, be sure to use the Edit Check reports for each site. The Edit Check reports are the most accurate for meal counting and claiming procedures.
- Field trip meals need to be checked off on a student roster sheet as the student takes the reimbursable meal. The check off sheets need to be returned to the District Office as documentation to support the reimbursable meals were served.

#### **Findings and Corrective Action Needed:**

- ❑ **Finding:** The October lunch and regular breakfast claims resulted in an overclaim due to the wrong reports being used to submit the monthly claim. The October severe need breakfast claim resulted in an underclaim.

**Corrective Action Needed:** From now on, use the Edit Check reports to submit the monthly claims. Submit a copy of the Edit Check reports for each site in the district, for each program (NSLP, SBP) for the month of November 2018.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to the food service director and staff at Elk Mound High School for their questions and cooperation during the administrative review. Thank you for sending meal pattern documentation prior to the onsite review as this greatly expedited the process onsite. Reviewers loved seeing the flavor station, multiple fruit and vegetable options, and hearing about your successful calico bean recipe! Keep up the great work!

### Comments/Technical Assistance/Compliance Reminders

#### **Production Records and A la Carte Production Records**

Production records are intended to be useful tools to record information prior to production, during production, and following production. DPI has a list of requirements for production records, and the following needs to be included in your templates:

- Number of reimbursable and non-reimbursable meals (adult) planned
- Menu Type (breakfast or lunch)
- Grade Grouping (eg, 9-12)

Visit our [Production Records](#) webpage for more information, including a link to the production record requirements (“[Must Haves and Nice to Haves](#)”) list (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>).

#### **A la Carte options**

It was observed that many students are choosing the a la carte food options rather than choosing the reimbursable meal at both breakfast and lunch. Many of the a la carte options can be made into a reimbursable meal, however, students were not taking advantage of it. It was discussed with the food service director and kitchen staff to try the following to improve participation:

- Move the a la carte items that can be made into a reimbursable meal to the main line.
- Include more signage so that students know they can bundle certain a la carte items with milk, fruit and/or vegetables to make a reimbursable meal.
- Have point of service staff prompt students to include other food components (one must be at least a ½ cup fruit or vegetable) to create a reimbursable meal.
- Include language in the morning announcements alerting students that they can create a reimbursable meal with some a la carte food options.

#### **Serving Sizes: In-House Yield Study**

Use these [in-house yield study directions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/conducting-an-in-house-yield-study.pdf) to determine how many pieces of fruit (eg, whole strawberries) to serve in order to credit as a ½ cup fruit (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/conducting-an-in-house-yield-study.pdf>). Have two people cut up whole strawberries to fill a ½ cup size spoodle. As they are cutting, keep track of how many whole strawberries it takes to fill the ½ cup spoodle. After each person has done this three times, add up and average the number of whole strawberries it takes to fill a ½ cup spoodle (round up if not a whole number). This is the amount of whole strawberries that must be served/taken to be considered a ½ cup fruit. Keep this documentation for your records.

### **Standardized Recipes**

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. 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>).

The following recipes should be updated to include all the required information, including detailed instructions, recipe yield, individual serving size, and age/grade groups served:

- Croissant sandwich
- Pepperoni Pizza
- Meatball recipe - “season to taste” is not standardized. Every person who makes this recipe according to their own taste will produce a slightly different finished product.
- Rice Pilaf
- Coleslaw. Consider using our [template for multiple grade groups and serving sizes](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-multiple.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-multiple.doc>).
- Chef Salad recipe

Visit our [Cycle Menu Resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) page for more recipe resources (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>).

### **School Breakfast Participation**

Consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break district wide to help increase student participation. Breakfast in the Classroom works well in elementary schools and mid-morning models work well in middle or high schools where they have a passing time to grab a meal between classes. This could be set up in the cafeteria or on mobile carts in the hallways. Consider keeping the cafeteria open until 8:15 so that students could go to the cafeteria to grab a breakfast to be eaten in their classrooms while attendance and homework assignments are turned in.

Refer to the [Serving Up a Successful School Breakfast Program Toolkit](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf) to find information on the different service models (starting on pg.11). Offering breakfast during the school day (as opposed to before the school day begins) generally sees greater student participation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf>).

Additional [school breakfast resources](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) found on our website (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

## School Breakfast Challenge

Make this school year the best one yet and see how easy it is to provide a healthy breakfast and a great start for every student. 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!

NKH will be providing the following amazing prizes:

- Grand Prize: \$1,000 for Highest Breakfast Participation Increase (2 Schools)
- \$750 Prizes for Most Improved Breakfast After the Bell (2 Schools)
- \$750 Prizes for Implementing School Breakfast Program (2 Schools)

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. **Deadline to apply is December 7, 2018.**

Ready to get started? [Register your School](#) and visit the [Hunger Task Force](#) website to gather all the details. Considering a new School Breakfast Program? Contact DPISBP@dpi.wi.gov.

You may also use this [School Breakfast brochure](#) to share the benefits of breakfast with parents ([https://dpi.wi.gov/sites/default/files/imce/wisconsin-school-meals-rock/\\_files/brochure-get-school-breakfast.pdf](https://dpi.wi.gov/sites/default/files/imce/wisconsin-school-meals-rock/_files/brochure-get-school-breakfast.pdf)).

### **Findings and Corrective Action Needed:**

**❑ Finding:** Standardized recipes missing key pieces of information.

**Corrective Action Needed:** Update and submit the following recipes to the public health nutritionist for review (refer to the technical assistance section above for more information about standardized recipes):

- Croissant sandwich
- Pepperoni Pizza
- Meatball recipe
- Rice Pilaf
- Coleslaw
- Chef Salad recipe

*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.*

## 3. RESOURCE MANAGEMENT

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

### Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs 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
- If students are taking alternate meals and being charged, the items must meet Smart Snacks and the students must be charged the nonprogram price for the items so you cover the cost. If the alternate meals meet the meal pattern, then they can be claimed, but either the students must be charged for the meal or money must be transferred in from Fund 10 to Fund 50. If the alternate meals are not being claimed and the student isn't charged, you may serve the student(s) any food/beverage you decide at no charge. Then the items do not have to meet Smart Snacks. However, you must keep track of the cost of those items served as well as labor and any other costs incurred to make a fund transfer into Fund 50. Non-federal funds must cover the cost of these alternate meals.

### Refunds

- 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. Any amount of money remaining in a student’s meal account must be refunded even if it is only 5 cents. If the household can no longer be contacted, all funds left in any student meal account 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>).

## **4. GENERAL PROGRAM COMPLIANCE**

### Civil Rights

### Technical Assistance(TA)/Compliance Reminders

#### Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended

that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

- If there are any tables in the school cafeterias that are labeled “Peanut Free” or “Allergen Free”, it is advised that you change the signs to “Peanut Aware” or “Allergen Aware” as you cannot guarantee the table will be free from any allergens.

### Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release a minimum of three places such as:
  - 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 the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

### Findings and Corrective Action Needed:

- **Finding:** The Confirming Official needs to complete the Civil Rights training annually.

**Corrective Action Needed:** Read through the [DPI Civil Rights training powerpoint presentation](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>). Submit an email this has been completed.

### Local Wellness Policy

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

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

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

#### Content of the Wellness Policy

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



[School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Resources:

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

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

**Corrective Action Required:** Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>). **Provide a timeline of when you plan to have the policy updated and compliant with the final rule.** The [Wellness Policy Builder](https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy (<https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1>).

### **Smart Snacks in Schools**



### **Comments/Technical Assistance/Compliance Reminders**

Great job with keeping all the supporting documentation for your Smart Snacks products. The only products that were non-compliant were the Smart Snacks KIND bars (Caramel Almond & Sea Salt Protein Bar) because they exceeded the allowable amount for total fat and saturated fat. These were entered incorrectly into the Smart Snacks calculator. If there is ever doubt about how a product should be entered into the calculator, hover the computer mouse over the blue information circles next to each answer option. They provide more information for how to categorize a product.

The KIND bars should be entered in the following way:

- Snack
- Protein food
- Other – the reason it is Other is that it has added oils (e.g., palm kernel oil) and nutritive sweeteners in it (e.g., glucose syrup, honey, sugar). The only nut products that are exempt from the total fat and saturated fat requirements are nuts that do not contain added oils or sugars.

Additionally, it was mentioned that a group at school may be interested in offering a coffee bar to students. Coffee and espresso drinks are allowable beverages at the high school (grades 9-12) level. Ensure products are offered in acceptable portion sizes to be compliant with the Smart Snacks standards. Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar needs to be added together when determining if the beverage meets the guidelines below.

Beverage Guidelines:

- Calorie-free beverages (for black coffee only)
  - <5 calories per 8 fl. oz.; ≤10 calories per 20 fl. oz.
  - Maximum serving size: 20 fl. oz.
- Lower-calorie beverages (for coffee with cream and/or sugar)
  - ≤40 calories per 8 fl. oz.; ≤60 calories per 12 fl. oz.
  - Maximum serving size: 12 fl. oz.

To help determine if coffee drinks are compliant, utilize the [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/). If they are, you will be able to print a reference sheet showing compliance directly from the website as record keeping documentation (<https://foodplanner.healthiergeneration.org/calculator/>).

### **Findings and Corrective Action Needed:**

**Finding:** KIND bars (Caramel Almond & Sea Salt Protein Bar) are not Smart Snacks compliant.

**Corrective Action Needed:** Submit a statement that says you will discontinue the use of these products.  
*Completed onsite, thank you!*

### **Professional Standards**

### **Commendations/Comments/Technical Assistance (TA)/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.).

### 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.
- Staff have the flexibility to complete training hours over two years. Ex: Director needs 12 hours per year, so 24 hours over two years. From July 1, 2018-June 30, 2020, the Director would need to complete 24 hours of professional standards training hours. This should be documented on the [DPI Professional Standards tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx).

### Findings and Corrective Action Needed:

- Finding:** Trainings are being tracked manually, but not on a spreadsheet.

**Corrective Action Needed:** Start tracking trainings on a spreadsheet, such as the [DPI Professional Standards tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx). Submit a copy of the completed tool.

### Food Safety and Storage

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

#### Sharing and No Thank You Tables

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

#### **Sharing Table**

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

**Sharing are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.**

#### **Considerations**

1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.

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

### **Wholesome Leftovers**

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

**Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.**

Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

### **Monitoring Log**

Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

### **Findings and Corrective Action Needed:**

- Finding:** The SFA has a sharing table without a Sanitarian-approved SOP for a sharing table on file.

**Corrective Action Needed:** Create or adapt an SOP specific for the sharing table. Get approval from your Sanitarian for the sharing table SOP. Submit a copy of the SOP including approval from the Sanitarian.

### **Buy American**

#### **Comments/Technical Assistance/Compliance Reminders**

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product. A “Domestic Commodity or Product” is defined as an agricultural commodity or product that is produced or processed in the United States using substantial

agricultural commodities that are produced in the United States (products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States).

“Substantial” means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs.

If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can be accepted in an email. Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.

The following information must be recorded on a Buy American Non-Compliant Product List. *Note:* In reference the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

When completing the [Buy American Non-Compliant Product list](#) there are 4 pieces of information that must be recorded:

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.
    - i. *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.)
    - i. *Ex. Blueberries are not available domestically during the months of December – June.*
  - c. **Availability** – Product(s) is not available to purchase domestically.
    - i. *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.)
    - i. *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.)
    - i. *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.
    - i. *Ex. The SFA received a donation of non-domestic oranges*

- ii. *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>).

### **Findings and Corrective Action Needed:**

**❑ Finding:** The following products are non-domestic or no country of origin was listed on the packaging and a [non-compliant product sheet](#) must be filled out for each one:

- Chunk light tuna - China
- Dole pineapple tidbits - Thailand
- Fresh roma tomatoes - Mexico
- Fresh Honeydew melon - Mexico
- French Dressing - Marketed by...

**Corrective Action Needed:** complete non-compliant product lists for each of the aforementioned products. Submit to the public health nutritionist for review.

### **Reporting and Recordkeeping**

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- Please keep all documents pertaining to the School Nutrition Programs for three years plus the current school year. Anything from the 14-15 SY and prior can be shredded.

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

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

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.
- Breakfast participation is very low at the High School. It may be beneficial to remind students that breakfast is available every day and that breakfast is free for all Free and Reduced eligible students.
- Something you can offer to reduce the stigma of taking breakfast would be to offer free breakfast to all students. You would still claim the students for the eligibility category they qualify for. This could be part of your spend down plan for your excess cash balance.

#### **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 the district, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) 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

## 5. OTHER PROGRAM REVIEWS

### Wisconsin School Day Milk Program

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

- The 2017-18 SY WSDMP claim was consolidated and submitted correctly.

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 student success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



*With School Nutrition Programs!*