

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

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**School Food Authority: Potosi School District**

**Agency Code: 22-4529**

**School(s) Reviewed: Potosi Elementary School**

**Review Date(s): 11/14-15/18**

**Date of Exit Conference: 11/15/18**

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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.

**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, 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](http://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](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).

**Appreciation/Commendations/Noteworthy Initiatives:**

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

**REVIEW AREAS**

**1. MEAL ACCESS AND REIMBURSEMENT**

**Certification and Benefit Issuance**

## Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** There is an issue with the programming of the Skyward software. Electronically certified benefit recipients do not show up on the benefits issuance document as DC. The software also contains inactive students which should be removed from the system. Please submit the Benefit's Issuance List after you have made the corrections in Skyward.  
**Corrective Action Needed:** Please contact the software provider to adjust the system programming.
- ✓ **Finding #2:** From the student sample reviewed for benefit's issuance, 1 student is receiving free benefits via income application but should be reduced as the income is over the free limit.  
**Corrective Action Needed:** Please notify this household of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be figured for these errors for the review period (October) and month of on-site review (November). **Completed onsite, No further action required.**
- ✓ **Finding #3:** From the student sample reviewed for benefit's issuance, 1 student is receiving free benefits which should be full pay because application was denied benefits when submitted.  
**Corrective Action Needed:** Please notify this household of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be figured for these errors for the review period (October) and month of on-site review (November). **Completed onsite. No further action required.**

## Verification

### Commendations/Comments/Technical Assistance/Compliance Reminders

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable, but these verifications are not considered part of the Verification sample. For more information, refer to the current [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

### Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** The applications chosen for verification did not have the confirming official signature recorded on the back of the application.  
**Corrective Action Needed:** Please provide a statement that going forward all applications chosen for verification will be confirmed and have recorded on the back of the application the confirming official signature.

## Meal Counting and Claiming

### Commendations/Comments/Technical Assistance/Compliance Reminders

- When submitting the claim it is necessary to use the edit check/Accuclaim to calculate your reimbursable meals by site for claim submission.
- The edit check must be reviewed monthly before claim submission to assure school is not claiming more meals than are eligible in any eligibility category.
- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- 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 every school day (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

### **Findings and Corrective Action Needed: Meal Counting and Claiming**

- ❑ **Finding #1:** The enrollment, free, reduced, and paid eligible students were reported incorrectly on the October claim because the Accuclaim was not used to calculate these numbers.  
**Corrective Action Needed:** Please submit the reviewed November edit check/Accuclaim that is used to submit the November claim.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations**

Thank you to the Food Service Director and school nutrition professionals at Potosi School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. The food service director is newer to the role, but shows great initiative to learn and carry out all regulations and best practices to provide the students with nutritious and appealing meals. The food service director's dedication shows in the perfect week of review for the meal pattern offered at Potosi Elementary.

Additionally, it is great that students are offered a variety of fruits at breakfast and a variety of both fruits and vegetables at lunch. This allows them to select and consume varieties they like or try new ones. All elementary students had at least the required ½-cup fruit or vegetable on their trays prior to the point of service during lunch on the day of review, with many taking more than the minimum requirement. Thank you for all that you do for the students of Potosi School District!

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

#### **Items at Breakfast**

Some of the granola bars planned for breakfast on the day of observation credit as less than 1.0 ounce equivalent (oz eq) of grain. These must be bundled with other items so at least 1.0 oz eq of grain is offered each day to meet the daily minimum requirement for grain, and so these items can be counted as an item for the breakfast meal pattern. 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 items each credit as less than 1.0 oz eq grain according the Exhibit A or the product formulation statement: Quaker Big Chewy Peanut Butter Chocolate Chip granola bar, Quaker Chewy Maple and Brown Sugar granola bar, Fieldstone Fruit & Grain Strawberry bar, Fieldstone Chocolate Chip granola bar.

#### **Whole Grain-Rich Products**

Foods that meet the whole grain-rich criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. The Cocoa Krispies

cereal planned for breakfast was not whole grain-rich. This cereal was removed from the serving line prior to breakfast service on the day of review. USDA has a very thorough [Whole Grain Resource](https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

#### Specific Product Information on Production Records

- Be specific on production records about the identity, brand, and description of the items served.
- List the specific type of granola bars and cereal offered, rather than just listing “granola bar” or “cereal” as these do not indicate exactly what was served. There is a wide variation in formulation of the many products that fall into these categories. Alternatively, cereal and granola bar “recipes” may be developed by determining average usage by cereal and granola bar type. With a recipe on file, you may then continue to document usage as a whole on the production record. You may use the guidance for creating a [milk recipe](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc), but substitute your cereal and granola varieties for the milk varieties (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc>).
- Fruit sizes (e.g., case count) should also be recorded.
- It is helpful to include not just portion size, but also crediting, on the production records. A list of production record requirements (“[Must Haves and Nice to Haves](#)”) and sample production record templates can be found 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>).

#### Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient. 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 for your kitchen to reflect the products and practices that are used. 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>).

#### Determining Serving Size Volume

Some items, such as baby carrots or French fries do not fit neatly into spoodles or measuring utensils. One way to determine the amount to serve in order to reach the planned serving size is to dice the product so that it fits into a measuring utensil without extra air. You may then count the number of pieces that went into the measuring utensil and that becomes the number or amount to serve.

#### Serving Size Signage

Many fruits and vegetables are being offered with a ¼-cup spoodle, but with a planned serving size of ½ cup. While students are aware that they may take two ¼-cup servings, it may be of benefit to indicate this with signage. Consider adding signage that informs students that one spoodle equals ¼ cup and two spoodles equals ½ cup. This will help students understand what they may select to satisfy the ½ cup fruit or vegetable Offer versus Serve requirement.

#### Meat/Meat Alternate Quantities for 4K

The updated CACFP/Pre-K meal pattern requires 1 ½ oz eq meat/meat alternate to be served to students not yet in kindergarten when not co-mingled with older students for lunch. Please ensure that

the exact serving size of meat/meat alternate items is determined and recorded on production records to show this requirement is met daily.

#### Exceeding Meal Pattern Quantity Requirements

It can be difficult to meet the dietary specifications if the menu is consistently exceeding the minimum quantity requirements specified for each grade group. For example, 4 ounce equivalents (oz eq) of grain were available to students at lunch one day during week of review. The pizza offered credits as 2 oz eq grain and the breadstick offered credits as 2 oz eq grain. Consider eliminating the breadstick on this day to reduce the calories, saturated fat, and sodium in this meal.

#### Foods Offered after the Point of Service

On the day of lunch observation, cheese was offered on the condiment table to accompany the hamburger. Any foods offered after the Point of Service (POS) must be taken into account when determining the dietary specifications for the meal (calories, saturated fat, trans fat, and sodium), but do not contribute towards the meal pattern requirements. Although usage was monitored for the K-5 students, consider adding the cheese slices to the service line so that they may be credited toward the meat/meat alternate component.

#### Field Trip Meals

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way for collecting meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

#### **Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality**

- ❑ **Meal Pattern Finding #1:** The production record templates in use are missing required information based on the [“Must Haves”](#) list and additional information should be recorded on production records (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>).
  - The breakfast production record should contain planned number of servings and amounts, as well as the actual number of servings and amounts. Consider using the breakfast production record template available on the [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).
  - The “Planned/Actual” columns should include two different numbers if the planned numbers are different from what is actually prepared.
  - The planned and actual number of servings prepared and the planned and actual amount (in purchase units) prepared should be two separate columns and both should be filled in for each menu item on the lunch production record.
  - Items offered on the veggie bar and all condiments need planned serving sizes.
  - The 4K section of the production records is missing information, such as the planned serving size and the number of servings prepared.

- The number of reimbursable and non-reimbursable (adult) meals served needs to be recorded at breakfast.
- The breakfast entree column shows that entree items are being counted as 2 items. However, all breakfast items are actually being counted as 1 item. The production record template should be updated to reflect this.
- Record any condiments with planned serving sizes and actual usage when they are offered at breakfast.

You may choose to modify your current production records or use the templates available on the Production Records webpage. A modified lunch production record to accommodate 4K, K-8, and 9-12 grade groups was provided during the onsite review.

**Corrective Action Needed:** Submit two days of completed breakfast, lunch, and veggie bar/condiment production records showing the above corrections have been made.

- ✓ **Meal Pattern Finding #2:** Breakfast signage was not posted prior to meal service on the day of review. Signage must be visible to students that indicates the offered components in each meal and tells students what they must select as part of a reimbursable. The breakfast signage must list the three components and the items offered. It must also communicate to students that under Offer versus Serve (OVS), they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination. Breakfast signage was available on site. Signage was filled in during the onsite review and posted the next morning for breakfast service. Please continue to complete this signage daily prior to breakfast service. **No further action required.**
- ❑ **Meal Pattern Finding #3:** The staff member assisting with the POS at lunch during the day of review was uncertain of the Offer versus Serve (OVS) requirements and stated that she relies on food service staff for assistance. All staff, even those outside of foodservice, working the POS during meal service should be trained on OVS to determine reimbursable meals. Additionally, since students are allowed to make a la carte purchases, the staff member operating the computer POS system must have a strong understanding of what is included with a reimbursable meal and what must be charged as a la carte.

**Corrective Action Needed:** Submit a written statement explaining who will check trays to ensure they are reimbursable. Submit a copy of completed OVS training (certificates of completion or signed rosters) for all staff who assist with the POS at breakfast and lunch. Possible training materials include:

- [Offer versus Serve webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story\_html5.html)
- Offer versus Serve - [Meal or No Meal PowerPoint presentation](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx) or [webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx; https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story\_html5.html)
- [Breakfast OVS handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf)

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

## Commendations/Comments/Technical Assistance/Compliance Reminders

### Annual Financial Report (AFR):

- All revenues and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

### Allowable Costs

- 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>).
- Alternate meals for students without funds to pay, that are provided free of charge, must have the entire meal cost funded from a non-federal source and are subject to nonprogram foods revenue regulation as food service may not absorb the meal cost.

### 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>).

## Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ✓ **Finding #1:** On the Annual Financial Report, only food cost expense was allocated to nonprogram foods and a portion of labor, purchased services, and other expenses must also be allocated to every program.  
**Corrective Action Needed:** Please resubmit your 17-18 Annual Financial Report with all expenses broken out by program and category. **Completed on site. No further action required.**
- ❑ **Finding #2:** The district's unpaid meal charge policy, states "Once a family's food service account balance are in the negative, free and reduced students will no longer be allowed to choose a la carte items." This is **overt identification**, which is not allowed in child nutrition programs. The policy also states "an alternative meal will be served to students when account balance over \$50.00 negative. This meal will consist of a peanut butter sandwich, vegetable/fruit, and beverage. The cost of this meal is \$.75. If this is a nonreimbursable meal, all items must meet the smart snacks regulation and must be priced according to the nonprogram foods revenue regulation. If it is a reimbursable meal, it must still be charged at the normal paid rate.  
**Corrective Action Needed:** Submit a timeline to update the unpaid meal charge policy and distribute to households.

## Revenue from Nonprogram Foods

## Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.

- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

- ✓ **Finding #1:** The nonprogram food revenue tool submitted did not meet the ratio requirement for nonprogram foods.  
**Corrective Action Needed:** Please submit a plan as to how you will cover all costs associated with nonprogram foods by either raising nonprogram food prices or contributing nonfederal funds. Prices have been raised and the tool was re-run which now meets the required ratio. **No further action required,**

## **4. GENERAL PROGRAM COMPLIANCE**

### **Civil Rights**

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

#### **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.

#### **Processes for complaints**

- All SFAs should have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complain Form](#) for assistance in filing these complaints ([https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)).
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

#### **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. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).



- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [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>).

#### **Public Release**

- SFAs must annually distribute the Public Release to:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need)
  - Major employers contemplating or experiencing large layoffs
  - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have 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: Civil Rights**

- ❑ **Finding #1:** The USDA Nondiscrimination full Statement that the school has on their school nutrition website is the shortened one and the long one or a link to the long one is required.  
**Corrective Action Required:** Please submit a copy of the correct USDA long statement and how you are going to put it on your food service page of your website.
- ❑ **Finding #2:** The process for receiving discrimination complaints does not reference the USDA requirements for submission. To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online or at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form ([http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html)).  
**Corrective Action Required:** Please submit a revised complaint procedure to include the above USDA requirement.
- ❑ **Finding #3:** The Public Release is not submitted to a local newspaper and it is not distributed to local grassroots organizations other than the church bulletin.  
**Corrective Action Needed:** Please submit a statement of the process for the 19-20 school year to submit the public release to a local paper unless charged and other grassroots places than church bulletin.

#### **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.

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

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

- **Finding #1:** The SFA's LWP does not contain all items on the checklist, and it states that "foods of minimal nutritional value" will not be sold in the school, and this term is no longer relevant to school food service as it was replaced with Smart Snacks in 2014. The [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) from DPI have valuable items such as the Wellness Policy Builder and the Wellness Policy checklist.

**Corrective Action Required:** Please provide a timeline for updating your policy to include all items on the above checklist to become compliant with the final rule.

### **SMART SNACKS IN SCHOOLS**

#### **Commendations**

It is commendable that the school store is selling an assortment of non-food items to students. This is a great way to allow the student organization to raise money while also providing non-food items as an option for all students. Additionally, foodservice is limiting the number of a la carte items available for

purchase to elementary students, which is a great way to promote the nutritious reimbursable meals offered.

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

Foods sold in schools during the school day must meet both the Smart Snacks general standards and nutrient standards unless the sales qualify for an exemption. Beverage standards vary by grade group. If multiple grade groups have access to beverages, the standards for the youngest grade group must be followed or access may be limited based on grade groups. You can find more information 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>).

There are two situations by which an organization may sell foods and beverages to students during the school day.

1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
  - a. These foods or beverages may be sold at any time and in any location.
  - b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards:
  - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
  - b. Exempt fundraisers cannot occur in the meal service area during meal times.
  - c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. 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>).

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

- ❑ **Smart Snacks Finding #1:** Items offered a la carte at breakfast and lunch do not meet the Smart Snacks standards. While only the elementary school was selected as the review site, a sampling of la carte foods offered to students in grades 6-12 were reviewed as part of the SFA-wide offsite assessment. The items reviewed that do not meet the Smart Snacks standards include:
  - Gatorade, Propel, and Ice sparkling water – these items are sold to 6<sup>th</sup>-8<sup>th</sup> grade students but do not meet the beverage standards for this grade group
  - Baked Cheetos - do not meet the general standards
  - Kettle Cooked BBQ chips - exceed the calories from total fat standard
  - Oreo Crisps - do not meet the general standards
  - Quaker Big Chewy Peanut Butter Chocolate Chip granola bar - exceeds calories from total fat standard
  - Fieldstone Chocolate Chip granola bar - exceeds calories from saturated fat standard

- Ritz Peanut Butter Crackers - do not meet the general standards
- Uncrustable sandwiches - exceed calorie and sodium standards (note that entrees offered the day of and the day after it is served as part of a reimbursable meal are exempt from the general and nutrient standards)

Please refer to the [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) for a table of the standards for foods and beverages (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf).

Additionally, nutrients for all items made from a recipe must also be calculated and then evaluated for Smart Snacks compliance and documented.

**Corrective Action Needed:** Submit a written statement describing how you will bring the a la carte options sold to students into compliance with the Smart Snacks standards. Include a timeline for corrections along with nutrition facts and ingredient labels or the Smart Snacks calculator printouts for any replacement items added to the a la carte menu.

- ❑ **Smart Snacks Finding #2:** The school store sells foods and beverages to students, including the K-5 students, which do not meet the Smart Snacks standards. These include:
- Gatorade
  - Ring Pop
  - Glazers donuts – do not meet the general standards
  - Cupcake - the ingredient list was not provided so compliance the general standards cannot be determined

**Corrective Action Needed:** Submit a written statement describing how you will bring the school store food and beverage options sold to students into compliance with the Smart Snacks standards. Include a timeline for corrections along with nutrition facts and ingredient labels or the Smart Snacks calculator printouts for any replacement items added to the school store.

## Food Safety, Storage and Buy American

### Commendations/Comments/Technical Assistance/Compliance Reminders

#### BUY AMERICAN PROVISION

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

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: “We certify that (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 accepted within an email.

- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that 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.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- 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 and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

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. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### **Findings and Corrective Action Needed: Buy American Provision**

- ❑ **Buy American Finding #1:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List:
  - Peppers (product of Mexico)  
**Corrective Action Needed:** Submit a copy of the non-compliant product form for the peppers.

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

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

##### **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 Potosi

School District, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. 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).

### **Findings and Corrective Action: SBP and SFSP Outreach**

- ❑ **Finding #1:** Summer food service outreach was not provided to students.  
**Corrective Action Needed:** Please provide a statement that you will notify students of the ability to receive free summer meals.

### **Wisconsin School Day Milk Program**

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

- Per the WSDMP Agreement, the SFA agrees to serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that your milk is Wisconsin-produced, and you may want to include that stipulation in your milk bid.

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

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

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