

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

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**School Food Authority: Mercer School District**

**Agency Code: 26-3484**

**School(s) Reviewed: Mercer School District (K-12)**

**Review Date(s): 3/27-3/28/2019**

**Date of Exit Conference: 3/28/2019**

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

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Mercer 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 DPI review team is confident that the district will continue to improve their knowledge and operation of child nutrition programs.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

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

Eighty-six (86) eligibility determinations were reviewed, zero (0) errors were identified. Nice job.

#### Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
  - When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

#### Annual Income

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

### Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) (IEGs) are used to determine applications, whether manually or electronically (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>). If done through software, please check that the income levels are updated each year after July 1.
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>).

### Household Size Box

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

### Incomplete Applications

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

### Application Forms

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

### Other Source Categorical

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

### Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) 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 to at least 3 of the following:

- 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.

#### 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.

#### Direct Certification

- Direct Certification electronically matches your student file to a state database of students in families enrolled in FoodShare, W-2 Cash Benefits, FDPIR, Medicaid or Foster Care.
- A child or other household member's receipt of benefits from an Assistance Program automatically extends eligibility for free benefits to all children who are members of the household. [7 CFR 245.6(b)(7)] Foster child benefits do not extend to other students in a household.
- SFAs and schools operating a Special Provision must conduct a data match between State records and student enrollment records at least once annually [7 CFR 245.6(b)(1)(v)].
- As a reminder, you are required to complete a full enrollment direct certification run 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.

#### 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.

### Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year.
- Mercer School District had a 0% certification error rate. More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA.

### Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) 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](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

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

- ❑ **Finding #1:** (112) SFA does not have a benefit issuance list to track student determinations.  
**Corrective Action Needed:** Provide a statement of understanding regarding the requirement of maintaining and accurate benefit issuance. Additionally, have Verifying and Confirming Official watch the webinar entitled, "[Preparing for Your Administrative Review, Meal Access and Reimbursement](http://media.dpi.wi.gov/school-nutrition/meal-access-and-reimbursement/story.html)" (<http://media.dpi.wi.gov/school-nutrition/meal-access-and-reimbursement/story.html>) and send sign-in sheet of date and signature.
- ❑ **Finding #2:** (113) Local officials with access to free and reduced data do not have USDA disclosure agreements on file.  
**Corrective Action Needed:** Submit copies of the signed [disclosure agreement form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>) for anyone working outside of food service, who is determined to need access to this information (e.g., IT, secretaries handling local fee waivers, staff handling state/federal reporting individual F/R data). The goal is to limit the number of people who need to know this information and make sure these individuals understand the consequences of improper sharing/release of this information.

**Note:** aggregate data (just F/R numbers or percentages without a connection to individual names does not require prior parental sign-off before sharing and often times satisfies the request).

## **Verification**

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

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within three days. When a benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- State agencies and LEAs are expected to have a system in place to provide written verification notices in the parent or guardian’s primary language, and to provide oral assistance if the parent or guardian has difficulty understanding the written request.

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

- ❑ **Finding #1:** (203) District did not complete verification process correctly: VO did not sign the application chosen for verification and the final “We Have Checked” letter was not sent to household chosen for verification.  
**Corrective Action Needed:** Submit a statement of understanding regarding the Verification process, and have VO watch the [webinar on Verification](#) and send the email confirmation of the quiz to reviewer.

## **Meal Counting and Claiming**

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

- Meals may only be charged to a student upon 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](#) 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.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.

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

- ❑ **Finding #1:** No confidence in meal count consolidation, inaccurate counting and claiming process—meals counted as students stand in line, not as meals are received and checked by the cashier/checker. Counts are recorded on ‘order’ sheets and then transferred to another count sheet and then entered into the computer. No definitive count sheets to verify claims.

**Corrective Action Needed:** Correct this point of service—use corrected paper rosters or use of POS software-- and submit 30 days of correct data for the school district to complete the recalculation.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations and Appreciations

Sincere thanks to the food service director, school nutrition professionals, and school personnel of Mercer School. We appreciate your time and efforts spent preparing for and participating in the onsite review. The food service director demonstrated a positive attitude and a receptiveness to technical assistance. She asked questions reflective of her desire to learn. All school personnel expressed willingness to make changes and to improve the School Meals Programs. Although the salad bar does not currently credit towards daily and weekly meal pattern requirements, the fruits and vegetable were colorful and varied, which the high school students particularly enjoyed.

### Technical Assistance and Program Requirement Reminders

#### **Non-Reimbursable Meals**

Eight students at Mercer School selected non-reimbursable meals during breakfast meal observation on Wednesday, March 27. Students left the point of service (POS) with fewer than three food items, including 1/2 cup of fruit, vegetable, or combination. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

Adequate signage helps students accurately select reimbursable meals by indicating how many items at breakfast or components at lunch must be taken to constitute a reimbursable meal.

#### **National School Lunch Program (NSLP)**

Meal service is not structured to comply with the required age/grade group meal pattern requirements (e.g. K-8 and 9-12). Students in grades 7 through 12 are co-mingled, and portion sizes for age/grade group 9-12 are served to all. This must be addressed by school or district administration as well as by food service.

If age/grade groups cannot be separated, consider the following strategies:

- Post additional signage indicating portion sizes appropriate to each age/grade group
- Provide different size serving utensils
- Provide different color meal trays (e.g. red for grades 7-8, blue for grades 9-12)

#### **Extra Items and Planned Portion Sizes**

Extra items, both creditable and non-creditable (e.g. salad bar [shredded cheese, cottage cheese, diced ham, iceberg lettuce, cucumbers, diced tomatoes], birthday cake, cookie, cheese sauce, pudding, etc.), are offered on the menu. Several of these foods could credit towards daily and weekly meal pattern requirements but currently do not. For example, the meal planner could plan fruits and vegetables on the salad bar to credit towards the meal pattern, when served a minimum of 1/8 cup, prior to the point of service (POS). While offering extra items occasionally is allowable and can be an incentive for program participation, staying within the dietary specifications for calories, sodium, saturated fat, and trans fat can

be very difficult when extras are served frequently. These foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal.

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

### **School Breakfast Program (SBP)**

An item at breakfast is defined as 1.0 ounce equivalent (oz eq) grain, 1.0 oz eq m/ma, ½ cup of fruit and/or vegetable, or 1 cup of milk. Under OVS 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.

As a reminder, no more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. It is possible to offer juice daily and still meet the 50 percent juice limit as long as it is offered along with fruit (fresh, frozen, dried, or canned). Use caution when determining if students can select duplicate juice cups with meals. SP 10-2012, Questions and Answers on the Final Rule defines an “offering” of fruits or vegetables for the purposes of assessing the juice limit, as “the amount a child is able to select at a given meal, regardless of the number of options/variety of fruits or vegetables. The total amount of juice available at all meals over the course of the week (separately for lunch and breakfast) is then divided by this total fruit offering to determine the weekly juice offering. No more than half of the total fruit offering may be in the form of juice.”

### **Offer Versus Serve (OVS)**

OVS is required for the 9-12 age/grade group for lunch, but it is not implemented properly for the K-8 nor 9-12 age/grade groups during SBP or NSLP. At lunch, students are served all five components rather than offered and allowed to select at least three components and decline at most two components. OVS is highly encouraged for the K-8 age/grade group in order to reduce food waste and allow students to make choices about which foods they want.

There is some confusion over the difference between OVS and the planned menu. The planned menu must be in compliance with all meal pattern requirements, both daily and weekly. OVS occurs only during meal service. Therefore, the printed menu, recipes, portion sizes on production records, etc., should reflect the menu and portion sizes as planned.

Under OVS, students must *select* at least 1/2 cup of fruit, vegetable, or a combination as one of their three components. However, in order to meet daily minimum requirements, they must be *offered* at least 3/4 cup of vegetable and 1/2 cup of fruit (following the K-5, 6-8, or K-8 USDA lunch meal pattern).

Three food components are required for adequate, nutritious meals for students and to warrant federal reimbursements. Within each component, different food items may be offered, giving students many combinations for building a reimbursable meal. Other than selecting the required minimum 1/2 cup fruit, vegetable, or combination serving, it is the student’s choice to select or decline a food component.

Even young children are capable of serving themselves based on their likes and dislikes. Training and teaching are needed initially to help this change happen effectively, but just like anything else that happens in a school, it can be taught. Signage is especially helpful when students are self-serving foods, such as hot or fresh vegetables, or canned or fresh fruits. When vegetables offered for self-service contribute towards weekly vegetable subgroup requirements, portion sizes of at least 1/8 cup each must



be communicated to students. Proper portion size utensils, such as spoodles, encourage students to take the planned portion and the amount required as part of a reimbursable meal. Consider adding signage to the salad bar, like the School Nutrition Team (SNT) [Salad Bar Signage](#), showing students how many pieces of fruits and/or vegetables to select based on the planned portion size(s) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

### Signage

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

### Vegetable Subgroups

The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students are getting a variety of nutrients each week, the USDA lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week.

Beans and peas (legumes) are excellent sources of dietary fiber and nutrients such as folate and potassium. Some foods commonly referred to as beans and peas, such as green peas, lima beans, and green beans, are not considered part of this vegetable subgroup because their nutrient profile is not like those of legumes.

Dark green vegetables are especially rich in Vitamin A, Vitamin C, and calcium. There are several vegetables that are green in color but not included in the dark green subgroup (e.g. asparagus, avocado, Brussels' sprouts, green beans, green peas, lima beans, and green peppers). There are green-colored vegetables in the starchy or "other" categories because of their nutrient profiles.

Mixed vegetables contains vegetables from multiple subgroups (corn, carrots, green beans, and green peas), including starchy. Therefore, it credits as **additional** vegetable. This still credits towards the daily minimum requirement for vegetables, but does not contribute to a specific vegetable subgroup.

Refer to the [Vegetable Subgroups handout](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>) from the [Menu Planning webpage](#) to identify commonly eaten vegetables in each subgroup (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

### USDA Food Buying Guide for Child Nutrition Programs

The [USDA Food Buying Guide for Child Nutrition Programs](#) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, m/ma, and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on "food items search" and type in a specific food in the "keywords" search box. Many different options may appear. Find the entry that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.

A webinar presented by USDA Child Nutrition Programs Nutrition & Technical Assistance Branch showcased the new FBG Mobile App and FBG Interactive Web Tool via a demonstration. Learn how to utilize the innovative features of these tools including search and navigation, the ability to compare food yield information, and the ability to create a favorite foods list. Access the [recorded webinar](https://youtu.be/UP_t3D7AYAM) ([https://youtu.be/UP\\_t3D7AYAM](https://youtu.be/UP_t3D7AYAM)) on the [Food Buying Guide Goes Digital! webpage](https://www.fns.usda.gov/tn/food-buying-guide-goes-digital) of the USDA Food and Nutrition Service website (<https://www.fns.usda.gov/tn/food-buying-guide-goes-digital>).

Most fruits and vegetables credit by volume served (e.g. 1/2 cup peaches, drained will credit 1/2 cup fruit) and the FBG will note if the crediting is different based on volume served (e.g. one medium banana credits 1/2 cup fruit). Reference the School Nutrition Team (SNT) [Half-Cup Crediting of Fruits and Vegetables Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) for amounts required to credit as 1/2 cup as well as suggested serving sizes (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>). If the product is not listed in the FBG, additional crediting documentation is required.

According to the FBG entry for Soups, canned, Condensed (1 part soup to 1 part water) tomato, one No. 3 Can (50 oz or about 46 fl oz) yields 11.50 one cup reconstituted servings. One cup serving credits one-quarter cup of red/orange vegetable towards daily and weekly meal pattern requirements.

### **Crediting Documentation**

Processed foods that are not listed in the [USDA Food Buying Guide for School Meal Programs](https://foodbuyingguide.fns.usda.gov/) (<https://foodbuyingguide.fns.usda.gov/>) must be accompanied by a product formulation statement (PFS), a Child Nutrition (CN) label, or a USDA Foods Product Information Sheet to sufficiently document meal component crediting. Do not accept crediting documentation that does not meet the requirements described on PowerPoint slides from The Whole Enchilada (meal pattern), left onsite for reference. Instead, secure a PFS directly from the manufacturer (not from a vendor or distributor [e.g. Sysco, U.S. Foods, etc.]), or save a CN label directly off the packaging the next time you receive the product(s). If proper documentation cannot be obtained, choose a different product(s) for school meals.

#### *State-Processed and USDA Foods Product Information Sheets*

Product formulations change frequently, therefore it is important that nutrition facts labels, CN labels, USDA Foods Product Information Sheets (USDA Fact Sheets), and PFS on file are kept up-to-date. State-Processed Product Information is updated annually and can be found:

#### [SY 2018-19 State-Processed Product Nutrition Information](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf)

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf>)

[USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) are organized by component and updated as needed (<https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets>). CN labels can be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed.

More information about crediting documentation can be found on the [NSLP Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs), under the CN labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

### **Portion Control**

Using tools correctly is an important aspect of portion control. The correct way to portion food is to use a level scoop, which means the item is served as planned. Heaping scoops provide excess calories and nutrients and increase food cost, as more food is required to serve the same number of students. Food

shortages may result. Conversely, scant scoops provide component shortages per portion and inadequate calories and nutrients. Excessive leftovers or food waste may result.

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

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

### **In-House Yield**

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the school food authority's next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG (e.g. Apples, fresh, 113 count). [Specific and verifiable procedures](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf), which must be followed, are available on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#thy) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#thy).

### **Exhibit A**

[Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1.0 oz eq for each specific group (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf). Exhibit A groups all grain products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:

- Group A: these products are hard and crunchy, dry and lightweight. Per ounce, they contain a good deal of grain.
- Group B: whether serving bagels, pizza crusts or tortillas, 1.0 ounce of these products all credit the same towards the meal pattern (1.0 ounce by weight = 1.0 oz eq grain).
- Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1.0 ounce of pancake does not credit as 1.0 oz eq like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz eq grain.

Exhibit A can be used to credit any of the products that appear in the table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

### **Whole Grain-Rich Requirement**

Foods that meet the whole grain-rich (WGR) 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. Grains that are not whole grain-rich cannot be credited toward the grain component. The following grain products are not WGR: Hospitality Crisp Rice, Hospitality Cocoa Munchees, Krusteaz Buttermilk Pancakes, Brickfire

Bakery Plain Bagels, Conestoga by Pioneer mini buttermilk biscuits, and Rich's Dough Roll Cinnamon Traditional 2.5 Ounce Frozen. USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

The terms "wheat" or "made with whole grains" on a product label do not necessarily mean that a product is WGR. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole. Alternatively, crediting documentation in the form of a PFS may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients.

### **Condiments**

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. The first sodium target remains in effect. Condiment portion sizes must be communicated to students.

Promote correct serving sizes by adding signage at the condiment station with a photo of what one tablespoon looks like, purchasing single-use portion cups to aid in portion control, or using signage on self-serve pumps. More information on sodium targets is found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage ([dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning)) under the Sodium heading.

According to the [Smarter Lunchrooms Movement](https://www.smarterlunchrooms.org/) (<https://www.smarterlunchrooms.org/>) a flavor station with herbs and spices allows students to personalize their meals and offers a way to experiment with different flavors. Calorie free and sodium free spices and flavors are recommended.

### **Communications**

Anyone involved with the USDA School Meal Programs may send an email to [join-schoolmealsnews@lists.dpi.wi.gov](mailto:join-schoolmealsnews@lists.dpi.wi.gov) to directly receive important School Nutrition program updates from the DPI. Additionally, the SNT Training Team hosts the [What's New with School Nutrition Webinar](https://dpi.wi.gov/school-nutrition/training/whats-new) on the second Tuesday of each month from 2:00 PM to 3:00 PM via Skype Meeting (<https://dpi.wi.gov/school-nutrition/training/whats-new>).

### *Training*

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) SNT trainings. These are offered in the summer and select other times throughout the year. Courses provide overviews of all areas of the NSLP and SBP requirements including meal pattern, OVS, and CACFP. Travel and meals are allowable expenses to the nonprofit food service account.

The 2019 School Nutrition Skills Development Courses (SNSDC) dates and locations have been released:

- Appleton (Fox Valley Technical College): July 16-18, 2019
- Milwaukee (Alverno College): July 23-25, 2019
- Rice Lake (Wisconsin Indianhead Technical College): July 30-August 1, 2019
- Middleton (Kromrey Middle School): August 6-8, 2019
- Wausau (Northcentral Technical College): August 13-15, 2019

Registration and class schedules will be posted to the website in early May. Please visit the [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage for more information (<https://dpi.wi.gov/school-nutrition/training#up>).

### *Small Victories (SV)*

SV training is designed to celebrate the unique environment that is specific to schools with small student enrollments. The tools found on the [SV webpage](#) are meant to assist foodservice professionals working in small schools as they create their own *Small Victories*. Attending in-person trainings and watching available webcasts count toward [GOALS requirements](#) (<https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>).

### **Corrective Action**

**Meal Pattern Finding #1:** Eight students at Mercer School selected non-reimbursable meals during breakfast meal observation on Wednesday, March 27. Students left the POS with fewer than three food items, including 1/2 cup of fruit, vegetable, or combination. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

**Required Corrective Action:** Submit two to three sentences describing how selection of non-reimbursable meals will be corrected and avoided in the future.

**Meal Pattern Finding #2:** The daily and weekly requirements for fruit were not met for age/grade group K-12 for breakfast during the review period as a result of ½ cup of juice and 3/8 cup of apple slices or ¼ cup of orange wedges offered daily. The daily and weekly minimum requirements for age/grade group K-12 are 1 cup and 5 cups, respectively. **This is a repeat finding, subject to fiscal action.**

**Required Corrective Action:** Describe **specifically** how the daily and weekly minimum requirements for fruit will be met for age/grade group K-12 for breakfast during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address apple slices and orange wedges in your reply.

**Meal Pattern Finding #3:** A total of 4 3/8 cups of fruit, including whole fruit and juice, were offered to age/grade group K-12 at Mercer School at breakfast over the course of the week, with 2.5 cups of that in the form of juice. This exceeded the weekly juice limit at breakfast of 50 percent of the total fruit offering (57.14 percent of the total fruit offering).

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

**Meal Pattern Finding #4:** Hospitality Crisp Rice, Hospitality Cocoa Munchees, Krusteaz Buttermilk Pancakes, Brickfire Bakery Plain Bagels, Conestoga by Pioneer mini buttermilk biscuits, and Rich's Dough Roll Cinnamon Traditional 2.5 Ounce Frozen are not whole grain-rich products.

**Required Corrective Action:** Discontinue serving these items. Submit crediting documentation (e.g. CN label, PFS, complete nutrition facts label with ingredient statement) or standardized recipes for replacement products, as applicable.

**Meal Pattern Finding #5:** Signage was not posted at breakfast to show students what constitutes a reimbursable meal.

**Required Corrective Action:** Submit a photo of signage posted at lunch, which includes the required 1/2 cup fruit, vegetable, or fruit vegetable combination statement. **No further action required.**

**Meal Pattern Finding #6:** The fruit component was missing on Wednesday and Thursday, February 13 and 14, of the week of review. The fruit component was also missing on Friday, February 1, and Friday, February 9, of the review period (February 2019). **Incomplete meals claimed for reimbursement during the review period will be subject to fiscal action.**

**Required Corrective Action:** Please refer to the corrective action under Meal Pattern Finding #13.

**Meal Pattern Finding #7:** Daily and weekly minimum requirements for fruit were not met for age/grade group 9-12 for lunch during the review period as a result of ½ cup of applesauce offered on Friday, February 15. The daily minimum requirement is 1 cup, and the weekly minimum requirement is 5 cups. **This is a repeat finding, subject to fiscal action.**

**Required Corrective Action:** Please refer to the corrective action under Meal Pattern Finding #13.

**Meal Pattern Finding #8:** Daily and weekly minimum requirements for vegetables were not met for age/grade groups K-8 and 9-12 for lunch during the review period as a result of ½ cup of corn offered on Friday, February 15. The daily and weekly minimum requirements for age/grade group K-8 are ¾ cup and 3 ¾ cups, respectively. The daily and weekly minimum requirements for age/grade group 9-12 are 1 cup and 5 cups, respectively. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

**Required Corrective Action:** Please refer to the corrective action under Meal Pattern Finding #13.

**Meal Pattern Finding #9:** Missing beans and peas (legumes) and dark green vegetable subgroups for lunch during the review period. The weekly minimum requirements for the beans and peas (legumes) and dark green subgroups is 1/2 cup each. **This is a repeat finding, subject to fiscal action.**

**Required Corrective Action:** Please refer to the corrective action under Meal Pattern Finding #13.

**Meal Pattern Finding #10:** Missing crediting documentation for Butcher Boy Green Chile Prefried Beef & Bean Burrito (2030001), planned for lunch during the review period on Tuesday, February 12.

**Required Corrective Action:** Submit a PFS for this item. If proper documentation cannot be obtained, discontinue using this product for school meals and submit crediting documentation for a replacement product.

**Meal Pattern Finding #11:** Missing standardized recipe(s) for Sub Bar and missing crediting documentation for roast beef, salami, and bologna, offered daily for lunch during the review period.

**Required Corrective Action:** Submit standardized recipe(s) for Sub Bar, including weights for each luncheon meat. Submit PFSs for roast beef, salami, and bologna. If proper documentation cannot be obtained, discontinue using these products for school meals.

**Meal Pattern Finding #12:** The daily and weekly minimum requirements for m/ma were not met for lunch during the review period. The following represent the portion sizes planned during the review period:

- Daily: Subs (see Meal Pattern Finding #)
- Monday: Chicken patty (2 oz eq)
- Tuesday: Butcher Boy Green Chile Prefried Beef & Bean Burrito (see Meal Pattern Finding #)
- Wednesday: Grilled cheese (1.5 oz eq)
- Thursday: Heart shaped chicken nuggets (3 each, 2 oz eq)
- Friday: Corn dogs ([K-8] 3 each, 1 oz eq; [9-12] 6 each, 2 oz eq)

The daily and weekly minimum requirements for age/grade group K-8 are 1 oz eq and 8 oz eq, respectively. The daily and weekly minimum requirements for age/grade group 9-12 are 2 oz eq and 10 oz eq, respectively.

**Required Corrective Action:** Please refer to the corrective action under Meal Pattern Finding #13.

**Meal Pattern Finding #13:** The daily and weekly minimum requirements for grain were not met for lunch during the review period. The following represent the portion sizes planned during the review period:

- Monday: Sub (2 oz eq)
- Tuesday: Butcher Boy Green Chile Prefried Beef & Bean Burrito (see Meal Pattern Finding #)
- Wednesday: Grilled cheese (2 oz eq)

- Thursday: Heart shaped chicken nuggets (3 each, 1.25 oz eq)
- Friday: Corn dogs ([K-8] 3 each, 1 oz eq; [9-12] 6 each, 2 oz eq)

The daily and weekly minimum requirements for age/grade group K-8 are 1 oz eq and 8 oz eq, respectively. The daily and weekly minimum requirement for age/grade group 9-12 are 2 oz eq and 10 oz eq, respectively. **This is a repeat finding, subject to fiscal action.**

**Required Corrective Action:** Complete and submit menu planning worksheets for K-8 and 9-12 age/grade groups (left onsite and emailed to the food service director), outlining planned portion sizes for all components at lunch, which meet both daily and weekly minimum requirements.

**Meal Pattern Finding #14:** Inappropriate implementation of OVS.

**Required Corrective Action:** Watch the [Offer Versus Serve webcast](https://dpi.wi.gov/schoolnutrition/training/webcasts#ovs) (https://dpi.wi.gov/schoolnutrition/training/webcasts#ovs) and the [Get the Scoop on Breakfast: Part 2 \(Offer versus Serve\) webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#sbp) (https://dpi.wi.gov/school-nutrition/training/webcasts#sbp) on the [SNT Training webpage](https://dpi.wi.gov/school-nutrition/training) (https://dpi.wi.gov/school-nutrition/training). Submit certificates of completion for the food service director, school nutrition professional, and school personnel who determine reimbursable meals at the point of service (POS). Submit three to five sentences describing implementation of OVS in the reimbursable meal service line.

**Meal Pattern Finding #15:** Meal service is not structured to comply with the required age/grade group meal pattern requirements.

**Required Corrective Action:** Describe how the food service director, school nutrition professional, and school personnel will identify each student by age/grade group and what changes will be made to the structure of meal service, if applicable. Acknowledge in your reply that students in grades 7-8 will no longer be served the lunch meal pattern for age/grade group 9-12.

## **Smart Snacks**

### **Beverage Sales to Multiple Age/Grade Groups**

If multiple grades have access to a beverage vending machine, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a beverage vending machine in the cafeteria is available to kindergarten through twelfth graders, beverages must meet Smart Snacks standards for the K-5 age/grade group. Only plain water (flat or carbonated), milk (less than 8 fluid ounces; skim [flavored or unflavored] or low-fat [unflavored]), or 100% juice (less than 8 fluid ounces) may be sold to students in the K-5 age/grade group. Consider replacing non-compliant products or locking specific machine rows. Sales of non-compliant beverages may not begin until 30 minutes after the end of the instructional school day.

**Smart Snacks Finding:** Gatorade (Orange and Cool Blue), SoBe lifewater (Black and Blueberry and Yumberry Pomegranate), Klarbrunn Vita Ice (black raspberry), and Bubbl'r (cranberry grapefruit, cherry guava, pitaya berry, twisted) sold in beverage vending machines are non-compliant with Smart Snacks beverage standards, as described above.

**Required Corrective Action:** Per conversation with the District Administrator, submit a copy of Mercer School's policy restricting K-8 access to the beverage vending machine. Submit a photo of signage posted on the beverage vending machine. Finally, as the labels on the vending machine are not representative of the beverages, submit updated nutrition facts labels for all products.

## **Buy American**

There are four pieces of information per non-compliant item that must be recorded on the [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) or SFA equivalent:

1. Date

2. Name of product
3. Country of origin
4. Reason
  - a. Cost analysis
  - b. Seasonality- record the months that the domestic product is not available
  - c. Availability
  - d. Substitution- record the reason the distributor substituted the product
  - e. Distribution- record the reason the distributor carries the non-domestic product
  - f. Other- explain

You may record additional information if you find it beneficial.

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

- Wide egg noodles (Arrezzo) from Italy
- Canned pineapple from Indonesia

Alternatively, schools may use the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) to track product(s) which do not have country of origin labeling and for purchases that do not comply with the Buy American Provision (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>).

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

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

- The consultant address financial topics with the Authorized Representative the agency’s Child Nutrition Program report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency’s account. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage ([dpi.wi.gov/nutrition/online-services](https://dpi.wi.gov/nutrition/online-services)).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

#### Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The report was changed starting with the 2016-2017 SY and the new [‘16-‘17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the



foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.

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

#### 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 to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot 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>).

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>

- 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](#) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

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

- **Finding #1:** ‘17-‘18 AFR beginning balance does not match ending balance from ‘16-‘17.  
**Corrective Action Needed:** Please resubmit your ‘17-‘18 Annual Financial Report with beginning balance and ending balance corrected. Email an updated report to reviewer. **Corrected on-site, no further action needed.**

### **Paid Lunch Equity (PLE)**

Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the [PLE ‘In a Nutshell’](#) for more information on the PLE tool (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf>).
- Refer to the most recent [memo](#) from DPI (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf>).
- Refer to the most recent [guidance memo](#) from USDA (<https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf>).
- Step by step instructions to completing the PLE tool can be found on our [financial website](#) under Paid Lunch Equity (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

### **Revenue from Nonprogram Foods**

Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.

- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- 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>).

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

- 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>).

### Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the minimum pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

### Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

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

- ❑ **Finding #1:** PreK and community meals are tracked by and served out of school food service program and not claimed. Charged to Community Fund 80.  
**Corrective Action Needed:** Please provide ledger showing fund transfer to Fund 50, covering all costs, for all PreK meals and community meals. This must cover all costs as well as some profit, not just food costs.
- ❑ **Finding #2:** Paid PreK-5<sup>th</sup> grade and all grade 6 milks are being served and are not reimbursable. These costs must be covered by a fund transfer.  
**Corrective Action Needed:** Please provide copy of the ledger/journal entry showing that all of these costs through the '18-'19 SY have been paid back to food service and an explanation for how these milks will be tracked and have costs covered going forward.

- ❑ **Finding #3:** An additional food item is served daily with the snack milk (WSDMP). This is being provided by the nonprofit school food service account. All retail costs of those items need to be repaid to food service. For tracking purposes, it is recommended to create a new tracking form, with all classrooms on it, with columns for both milk and the additional snack food item.

**Corrective Action Needed:** Please provide an explanation for how these food items will be tracked and have costs covered going forward.

### **Indirect Costs**

#### **Comments/Technical Assistance (TA)/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 an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. 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 the district's total.

## **4. GENERAL PROGRAM COMPLIANCE**

### **Civil Rights**

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

##### **Nondiscrimination Statement**

- When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 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 or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

##### **And Justice for All Poster**

- “And Justice for All” posters need to be posted in public view where the program is offered.

### Civil Rights Training

- **Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.**

### Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

### 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](#) 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](#) 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](#) 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.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

### Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits.

### Processes for complaints

- **Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.**
- **All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the State Agency within five days, per the permanent**

agreement. You will want to make sure that this is included in the district procedures to ensure compliance.

- All SFAs should have procedures (written procedures preferred) 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 Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) 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)).

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

- ❑ **Finding #1:** (803) District does not have a complaint policy regarding discrimination in USDA Child Nutrition Programs.  
**Corrective Action Needed:** Please provide a timeline for bringing this into compliance.
- ❑ **Finding #2:** (806) Annual Civil Rights training for staff and volunteers who administer any portion of School Nutrition Programs has not been conducted.  
**Corrective Action Needed:** Provide Civil Rights training to all staff who interact with program applicants & students and provide the sign-in sheet with the names and dates that the training was provided.

### **Local Wellness Policy**

#### **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).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

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

**Finding:** SFA LWP meets some but not all requirements as stipulated above. Missing content on school meals, foods sold outside of the meal program, foods provided but not sold and food and beverage marketing.

**Corrective Action Needed:** Please provide a timeline for updating your policy to become compliant with the final rule.

#### **Professional Standards**

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

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

[Professional Standards: New Food Service Director Hiring Requirements](https://dpi.wi.gov/school-nutrition/professional-standards) (https://dpi.wi.gov/school-nutrition/professional-standards). Please see the DPI Professional Standards webpage for more information.

### **New Food Service Director Minimum Hiring Standards:**

**SFA Enrollment under 500: High school diploma (or GED) AND at least 1 year relevant experience in school nutrition.**

**SFA Enrollment under 2,499: High school diploma (or GED) AND at least 3 years relevant experience in school nutrition.**

**SFA Enrollment 2,500-9,999: Associate degree (or equivalent) with a related academic major AND at least 2 years relevant experience in school nutrition.**

**SFA Enrollment > 10,000: Bachelor's degree (or equivalent) in any academic major AND at least 5 years relevant experience in school nutrition.**

### **Professional Standards: Training Requirements**

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).

### **Annual Training Requirements for All Staff**

- **Directors: 12 hours**
- **Managers: 10 hours**
- **Other Staff (20 hours or more per week): 6 hours**
- **Part Time Staff (under 20 hours per week): 4 hours**
- **If hired January 1 or later, only half of the training hours are required during the first school year of employment.**



## **Findings and Corrective Action: Professional Standards**

- ❑ **Finding #1:** Staff have not completed the required training hours for the current school year.  
**Corrective Action Needed:** Provide a training plan for meeting the required training hours for the FSD and staff person in kitchen.
  
- ❑ **Finding #2:** Training is not being monitored on a tracking tool.  
**Corrective Action Needed:** Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

## **Water**

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

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

For more information and resources on the water requirement, see our [Water Availability webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/water-availability) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/water-availability>).

## **Food Safety and Storage**

### **Comments/Technical Assistance (TA)/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](http://www.fns.usda.gov/ofs/food-safety-flashes)). The [Office of Food Safety](#) website ([www.fns.usda.gov/ofs/food-safety](http://www.fns.usda.gov/ofs/food-safety)) includes food safety resources.

## **Food Safety Inspections**

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

## **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 temperatures ***must be*** recorded daily.
- Temperature logs are required to be kept for 6 months.

## **Food Safety Plans**

- The Food Safety Plan was available for review.
- 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 a listing of food service staff at that site. 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>)
- 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.

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf).
- Employees 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. Open items in reach-in cooler were not date marked and cases of beverages were noted on floor in storeroom.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

Time as Public Health Control

- When using “Time as a Public Health Control”:
  - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
  - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
  - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.

- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

### **Findings and Corrective Action: Food Safety**

- **Finding #1:** Missing Food Employee Reporting Agreements.  
**Corrective Action Needed:** Complete all missing agreements. Submit copies of completed agreements for FSD and checker to assigned DPI Nutrition Program Consultant.
- **Finding #2:** No annual food safety plan review completed.  
**Corrective Action Needed:** Review entire food safety plan and update as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review page as an attachment to assigned DPI Nutrition Program Consultant.
- **Finding #3:** Most recent food safety inspection report is not posted in a publicly visible location.  
**Corrective Action Needed:** Post most recent food safety inspection report in location visible to public. Submit photo as an attachment to assigned DPI Nutrition Program Consultant.

### **Reporting and Recordkeeping**

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. “LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

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

#### **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 Promotion**

The breakfast participation in the Mercer School District is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

### Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Though the Summer Food Service Program is not operated at Mercer, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

Resources:

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

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

- ❑ **Finding #1:** Summer Food Service Program outreach not occurring in district.  
**Corrective Action Needed:** Provide a statement indicating how the district will conduct SFSP outreach going forward.

## **Wisconsin School Day Milk Program (WSDMP)**

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

- **Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5<sup>th</sup> grade.**
- Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one.
- Per the Agreement for the WSDMP in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and perhaps include that stipulation in the SFA’s milk bid.
- [WSDMP FAQs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf) describe how cost per carton must be determined (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf).

### **Findings and Corrective Action: Wisconsin School Day Milk Program**

- ❑ **Finding #1:** Milks are being claimed for free and reduced students in grade 6 who do not qualify for this program.  
**Corrective Action Needed:** Please provide a statement of understanding regarding the requirements of the claiming for WSDMP. For the '18-'19 milk claim, remove the free/reduced 6<sup>th</sup> grade students from the count and only submit milk counts for free and reduced students in grades K-5<sup>th</sup>.
- ❑ **Finding #3:** District not calculating a weighted average to determine the per carton cost of milk for claiming.  
**Corrective Action Needed:** Please provide a statement of understanding regarding how milk cost for the WSDMP must be calculated.

“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!*