

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

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**School Food Authority: Mauston School District**

**Agency Code: 29-3360**

**School(s) Reviewed: Mauston High School, Grayside Elementary School**

**Review Date(s): 2/19/19-2/21/19**

**Date of Exit Conference: 2/21/2019**

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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 the Mauston 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 at both the high school and Grayside Elementary School for their willingness to make changes to meet school nutrition program regulations. We were especially impressed during breakfast meal service at the high school. On testing day, the staff was eager to wish the students good luck and let them know that it will be fine.

The DPI review team is confident that the school district of Mauston 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

Of 380 eligibility determinations reviewed, 4 errors were identified.

#### 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](#) 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:
  - 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)
- The district did send the public release to 5 outlets, including library, food pantry and county human services
- 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>).**
- **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.
- Mauston had a 1.0% 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:** From the student sample reviewed for benefit issuance, 2 students are receiving free benefits which should be reduced and 1 student is receiving reduced benefits which should be free. **Corrective Action Needed:** Please notify these households of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Also, inform household of increase in benefit, with the change occurring within 3 calendar days. Record the date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be figured for these errors for the review period (January) and month of on-site review (February). **Corrected on-site, no further action necessary.**

## 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.

## 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).**
- The meal counting and claim for the Review Month revealed an underclaim of 500 meals for school #80 for NSLP. Email will be sent to DPI accounting for correction.
- **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:** Schools listed on the DPI online contract do not match the DPI School Directory.  
**Corrective Action Needed:** Please add school #110 (Mauston Montessori Charter School) to the online contract (so meals from that school are claimed under that school, using current, separate edit check). Please inform reviewer when completed so contract can be reapproved.

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

### Commendations

Sincere thanks to the school food service staff at Mauston School District. We thoroughly appreciate your time and efforts not only in preparing for this review, but also in all that you do to ensure the students have enjoyable meals every day. Food service staff have a great relationship with the students and it shows. All of the food service staff and administrative staff were very welcoming and helpful while we were on-site.

Thank you, also, to the Food Service Director for sending documentation and promptly answering questions both prior to the on-site review and during the on-site review. We very much appreciate all that you do for the students of Mauston School District!

### **Comments, Technical Assistance, and Compliance Reminders: Meal Pattern**

#### **Training:**

Anyone involved with the United States Department of Agriculture (USDA) School Meal Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free and reduced meal applications, meal pattern, and record keeping requirements.

Travel and meal expenses are allowable food service expenses. Information on upcoming trainings can be found on [DPI's Training Page](https://dpi.wi.gov/school-nutrition/training#up) (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast Page](https://dpi.wi.gov/schoolnutrition/training/webcasts) (<https://dpi.wi.gov/schoolnutrition/training/webcasts>).

#### **Production Records:**

Production records are intended to be useful tools to record information prior to production, during production, and following production. Accurate production records aid the menu planner with forecasting, ordering, future menu planning, and reducing both food waste and food costs.

Be specific on production records. "Bars" and "Juice" are generic terms. Instead, list out the variety of each item planned and used. For example, "Cinnamon Toast Crunch Bar" or "Orange Tangerine" Juice are more descriptive and will aid in planning, production, and forecasting.

Additionally, milk is currently listed on some production records, but milk type and usage is not recorded.

The production record template currently in use does not meet requirements. While there is no required production record template, there are some examples that may be used on our [Production Records](#) webpage. A copy of the production record requirements ("[Must Haves and Nice to Haves](#)" list) can also be found at that link (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

#### **Dietary Specifications:**

- **Full sodium or full-fat foods:** Currently, various high-sodium and full-fat condiments are being used in standardized recipes and common food offerings. A few examples include Bar-B-Que Sauce, some dressings and soup broth. While these foods do not credit towards the meal pattern, they must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium), which may make it very difficult to stay within the dietary specification limits if these "extras" are consistently offered on a routine basis. Occasional use of such foods is allowable and can be a nice incentive for participation for menu items with historically low sales, however frequent use of high-sodium, full-sodium, and full-fat foods is strongly discouraged and does not align with the intention of Child Nutrition Programs to help students develop healthy eating habits.
- **Condiment Signage:** Condiments are placed on a counter after Point of Sale (POS). Items such as ketchup and mustard are served without portioning control. Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled.



Please monitor your school's condiment usage and communicate appropriate portion sizes to students. This can be done by individually portioning condiments, utilizing signage in front of the condiments conveying appropriate portion size such as, "One pump, please," and limiting the amount of condiments served.

### **Menu planning and Meal Pattern Compliance: Meeting daily and weekly meal pattern requirements.**

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. When multiple reimbursable meals are offered, it is important to make sure that each meal service line meets the daily and weekly meal pattern requirements separately because students are only able to select one entrée option. This includes all alternate entree combinations and options, such as the Jammer Boxes and the Chef's Salad. While not compulsory, it may be beneficial to use our Menu Planning Worksheets to assist with ensuring that all available entree items meet daily and weekly requirements. These may be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage, under the Menu Planning Worksheets heading (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools).

### **Grain-based Dessert Limits**

Multiple daily alternate entrees, the Chef's Salad and the Jammer Box, contain whole grain items such as sweet graham crackers and breakfast bars, which are classified as dessert items at lunch, thus exceeding the grain-based dessert limit. No more than 2.0 ounce equivalents (oz eq) of grain-based desserts can be offered per week at lunch. Grain-based desserts must be whole grain-rich to count towards the grain component. If a grain-based dessert is not whole grain-rich (made with more than 50 percent enriched grains) it cannot count towards the grain component. However, grain-based desserts contribute towards the weekly grain-based dessert limit regardless of whether they are whole grain-rich or not (e.g., a slice of cake made with enriched white flour cannot credit towards the grain component, but it counts towards the grain-based dessert limit for the week in which it is served).

[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). Additionally, Exhibit A provides information on which items are allowed as dessert at lunch and breakfast.

### **School Breakfast Program**

The 9-12 breakfast meal pattern requires at least 1.0 oz eq grain be served at breakfast. Meat/meat alternate (m/ma) may count towards the grain component at breakfast only after the daily 1.0 oz eq grain requirement has been met.

The Hormel Breakfast Combos Ham, Egg, and Cheese bar offered daily (credits as 0.25 oz eq grain + 1.0 oz eq m/ma) was not paired with another grain item, falling short of the daily 1/0 oz eq grain requirement at breakfast. Items that provide less than 1.0 oz eq grain must be bundled with other items so that at least 1/0 oz eq of grain is offered each day to meet the daily minimum grain requirement and so that these items may be counted as an item for the breakfast meal pattern. An item is defined as 1.0 oz eq grain, 1.0 oz eq meat/meat alternate, ½ cup of fruit/vegetable, or 1 cup of milk).

### **Signage**

Adequate signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal. Some of the signage posted is confusing and could be interpreted as limiting the amounts of fruits



and vegetables that students may select to quantities smaller than the required daily minimum offering. Some signage reads “all lunch meals must take a fruit of your choice,” which is also not accurate.

Signage is especially helpful when students are self-serving foods, such as fruit or vegetables on a garden bar. It may be helpful to post pictures of what the menu planner expects the students to take. Signage examples can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) web page (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

## **MEAL PATTERN AND NUTRITIONAL QUALITY FINDINGS AND CORRECTIVE ACTION**

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

**Note:** Fiscal action is required for select repeat violations found during an Administrative Review (AR). Because grain shortages were found during the last AR as well as the current AR, fiscal action will be applied. There will be a re-claim for meals from week of review to be determined once all Corrective Action items are received. Meal pattern findings documented during the School Year 214-2015 AR included a missing grain item at breakfast and a missing grain component at lunch. During the 2014-2015 AR, multiple grain shortages and missing grain items/components were identified, which triggered an expanded review to identify any further systemic menu planning issues for grain products. From the 2014-2015 AR Report: “Due to the missing grain component (that was fixed prior to meal observation at West Side Elementary), and the shortage of grains during the review week, the review will be expanded to the entire review month of January for all grain products.”

**Meal Pattern Finding 1: Documentation.** Some relevant documentation was not available prior to the onsite Administrative Review.

**Required Corrective Action:** Please provide all necessary crediting documentation (standardized recipes, Product Formulation Statements, or Child Nutrition labels) as well as planned portion sizes for the following items served, as well as any additional items that may have been offered, on the a’la carte and deli lines during week of review:

- Chicken Fajita Pizza (1/7)
- Turkey Ham & Cheese Breadsticks (1/7)
- Cheeseburger (1/7)
- Buffalo & Ranch tater tots (1/7)
- Tuna Sandwich (January 7, 8, 9)
- Chicken Dumpling Soup (January 7, 8, 10)
- Breakfast Pizza (1/8)
- BBQ Chicken Sandwich (1/8)
- Corn dog (1/8)
- Waffle Fries (1/8)
- Jalapeno Cheese Pretzel (January 8, 11)
- Chicken Salad Wrap (January 8, 10, 11)
- Buffalo Pizza (1/9)
- Breaded Chicken Patty (1/9)

- Cheesy Potato Puffs (1/9)
- Ham and Potato Soup (1/9)
- Supreme Pizza (1/10)
- Cheese Stuffed Pretzel with side cheese (1/10)
- Sloppy Joe (1/10)
- Curly Fries (1/10)
- Beef Sub (January 10, 11)
- BBQ Chicken Pizza (1/11)
- Cheesy Chicken Wrap (1/11)
- Buffalo Chicken Bites (1/11)
- Crinkle cut fries (1/11)
- Ham & Cheese Sandwich (1/11)
- Chicken Noodle Soup (1/11)

**Meal Pattern Finding 2: Production Records.** Current production records do not include all required information. Please see Technical Assistance for production record resources.

**Required Corrective Action:** Please submit three full days of completed production records, updated to reflect these requirements. Update production records to include the following missing information:

High School Breakfast:

- Serving Site
- Grade Grouping
- Planned serving size
- Planned/actual quantity prepared in purchase units
- Amount leftover
- Milk types and usage
- Number of planned meals

High School Lunch, including all foods that can be included in the reimbursable:

- Planned serving size
- Planned/actual quantity prepared in purchase units
- Milk types and usage

Elementary Lunch:

- Grade grouping(s)
- Planned/actual servings prepared
- Planned/actual quantity prepared in purchase units
- Milk usage
- Number of planned meals

**Meal Pattern Finding 3: Daily Grain Shortage at Breakfast.** The daily minimum requirement for grain was not met for breakfast daily as a result of the Hormel Combo Bar (credits as 0.25 oz eq grains + 1.0 oz eq m/ma). These bars credit as less than 1.0 oz eq of grain and must be bundled with other items so that at least 1.0 oz eq of grain is offered each day, to meet the daily minimum for grain requirement, and so these items can be counted as an item for breakfast meal pattern.

**Required Corrective Action:** Complete and submit menu planning worksheets for the 9-12 age/grade group outlining planned portion sizes for all food items at breakfast and components at lunch for week of review, which meet both daily and weekly minimum requirements.

[Instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf) for completing Menu Planning Worksheets:  
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf>)

9-12 Menu Planning Worksheet, [breakfast](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx>)

9-12 Menu Planning Worksheet, [lunch](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc>)

[Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf), for reference on daily and weekly requirements  
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>)

**Note:** Technical Assistance on the breakfast meal pattern was provided during the School Year 2014-2015 AR. The following was written in the report: *“Breakfast Meal Pattern: Since July 1, 2014, the breakfast meal pattern has required that at least 1 cup of fruit be offered daily at breakfast. As a reminder, no more than half (50%) of the fruit offered over the course of a week can be in the form of juice. It is also important that the menu planner has determined ahead of time whether items crediting as 2.0 ounce equivalents (oz eq.) count as one or two food items, or if bundled items count as 1 or 2 items (example: cold cereal with string cheese) as this is up to the menu planner to decide. Then your signage must clearly communicate to students what foods they can select to have three items for a reimbursable breakfast.”*

**Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

**Finding 4: Weekly Grain Shortage at Breakfast.** Pursuant to the daily grain shortage for the 9-12 breakfast, there was a weekly grain shortage for the week of review. Each day, the Hormel Combo Bar (0.25 oz eq grain) was planned and served, without being an additional grain offering. This meets neither daily (1.0 oz eq) nor weekly (9 oz eq) requirements for the 9-12 grade grouping.

**Required Corrective Action:** Please refer to the corrective action under **Finding #3**.

**Finding 5: Missing Vegetable Subgroup, Other.** During week of review, no “other” vegetable was served at Greyside Elementary, falling short of the weekly ½ cup requirement for the K-5 grade group, as detailed below:

- Monday, 1/7/19: ½ cup potato wedges (½ cup Starchy Vegetable)
- Tuesday, 1/8/19: ½ cup carrots + 2 oz salsa (⅝ cup Red/Orange Vegetable)
- Wednesday, 1/9/19: ½ cup broccoli (½ cup Dark Green Vegetable)
- Thursday, 1/10/19: 1 serving taco meat (contains ⅛ cup Red/Orange Vegetable) + ½ cup corn (½ cup Starchy Vegetable; ⅝ cup total vegetable). Shredded lettuce and diced tomato were also served this day, but were intended as garnished and were not portioned to meet meal pattern requirements.
- Friday, 1/11/19: ½ cup baked beans (½ cup Beans/Peas/Legumes) + ½ cup Sunbelievable Slushie (½ cup Red/Orange Vegetable; 1 cup total vegetable).

**Required Corrective Action:** Complete and submit menu planning worksheets for the K-5 age/grade group, outlining planned portion sizes for all components at lunch for week of review, which meet both daily and weekly minimum requirements.

[Instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf) for completing Menu Planning Worksheets:  
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf>)

K-5 menu planning worksheet, [lunch](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-5.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-5.doc>)

[Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf), for reference on daily and weekly requirements  
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>)

***Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.***

**Finding 6: Daily Vegetable Shortages.** Insufficient vegetable quantities were served on four days of the review week, Monday through Thursday, as detailed below:

- Monday, 1/7/19: ½ cup potato wedges (½ cup Vegetable)
- Tuesday, 1/8/19: ½ cup carrots + 2 oz salsa (⅝ cup Vegetable)
- Wednesday, 1/9/19: ½ cup broccoli (½ cup Vegetable)
- Thursday, 1/10/19: 1 serving taco meat + ½ cup corn (⅝ cup total vegetable). Shredded lettuce and diced tomato were also served this day, but were intended as garnished and were not portioned to meet meal pattern requirements.

**Required Corrective Action:** Please refer to the corrective action under **Finding #5**.

***Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.***

**Finding 7: Weekly vegetable shortage.** As detailed in **Finding 6**, the daily vegetable shortages lead to an overall weekly vegetable shortage, 3 ¼ cup total vegetable of the 3 ¾ cup required for the K-5 grade group.

- Monday, 1/7/19: ½ cup potato wedges (½ cup Vegetable)
- Tuesday, 1/8/19: ½ cup carrots + 2 oz salsa (⅝ cup Vegetable)
- Wednesday, 1/9/19: ½ cup broccoli (½ cup Vegetable)
- Thursday, 1/10/19: 1 serving taco meat + ½ cup corn (⅝ cup total vegetable). Shredded lettuce and diced tomato were also served this day, but were intended as garnished and were not portioned to meet meal pattern requirements.
- Friday, 1/11/19: ½ cup baked beans + ½ cup Sunbelievable Slushie (1 cup total vegetable)

**Required Corrective Action:** Please refer to the corrective action under **Finding #5**

***Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.***

**Finding 8: Signage.** Current signage states that “two (2) items total with main meal [referring to fruits and vegetables, most of which are served in ½ cup portions]” and “all lunch meals must take a fruit of your choice,” which does not accurately reflect the requirement that students must select at least ½ cup fruit, vegetable, or combination to build a reimbursable meal, nor does it adequately reflect the minimum amounts that must be offered to students as part of a 9-12 reimbursable meal.

**Required Corrective Action:** Submit a picture of complete signage posted near the lunch and breakfast service line which adequately conveys the quantities of fruit and vegetable components available as part of a reimbursable meal as well as the ½ cup fruit, vegetable, or combination requirement.

## SMART SNACKS

### Technical Assistance and Compliance Reminders: Smart Snacks

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

**Vending:** All foods (vending machines, school stores, fundraisers, etc.) sold anywhere on school campus, between midnight and 30 minutes after the end of the instructional school day, must be in compliance with the “Smart Snacks” regulations. This includes vending machines. Recommended best practices suggest that a vending company routinely provide the SFA with an up-to-date list of products and nutrition information for compliance review.

- If the SFA chooses to sell non-compliant items in vending machines, the machines must be non-operational between midnight and 30 minutes after the end of the instructional school day.

### SMART SNACKS FINDINGS AND CORRECTIVE ACTION

**Smart Snacks Finding 1:** Mauston School district has an extensive snack sales program. Nearly all of the items are Smart Snack compliant; however, the Starburst Sorbet Bars were identified as non-compliant while onsite.

The Starburst Sorbet Bars are not smart snack compliant. A product must meet one of the general standards: be whole grain rich, have a fruit, vegetable, dairy product, or protein food as the first ingredient, or be a combination food with at least ¼ cup fruit and/or vegetable. The ingredient list includes the following in this order: water, sugar, skim milk. This does not meet one of the general standards.

**Corrective Action Required:** Submit a statement detailing what will be done with this product to comply with the Smart Snack regulations.

**Smart Snacks Finding 2:** Several vending machines are onsite and are operational from 3:15pm until 7am. Smart Snacks regulations govern competitive sold throughout a school’s campus foods sold from midnight until 30 minutes after the end of the last instructional period. To comply with Smart Snacks standards, vending machines selling non-compliant items should not be operational between midnight and 30 minutes past the end of the instructional day.

**Corrective Action Required:** Submit a statement detailing what will be done with the vending machines to comply with the Smart Snack regulations.

## BUY AMERICAN

### Comments/Technical Assistance : Buy American

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

- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:
  1. Date
  2. Name of product
  3. Country of origin
  4. Reason
    - a. Cost analysis
    - b. Seasonality- record the months that the domestic product is not available
    - c. Availability
    - d. Substitution- record the reason the distributor substituted the product e. Distribution- record the reason the distributor carries the non-domestic product
    - e. Other- explain
- You may record additional information if you find it beneficial.
- Many products do not list country or origin or simply have information such as “marketed by” or “distributed by,” which makes identifying compliance or non-compliance with the Buy American provision challenging. If no country of origin is identified on the label, then the SFA must get certification from the distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.” This can accepted within an email.
- More information on the Buy American requirement as well as a suggested non-compliant tracking tool template can be found on the [Buy American webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) (https://dpi.wi.gov/school-nutrition/procurement/buy-american).
- Products without country of origin labels should also be tracked or verified through the distributor that they are indeed Buy American compliant. Examples identified onsite include:
  - All Sysco and Culinary Secrets spices - no Country of Origin Label
  - All General Mills cereals - listed “distributed by” but no Country of Origin Label

## **BUY AMERICAN FINDINGS AND CORRECTIVE ACTION**

**Buy American Finding #1: No Buy American tracking procedure was in place at time of review.** Five products were identified as Buy American non-compliant:

- Pineapple pieces, canned: from Thailand
- Mandarin Orange Segments, canned: from China
- Broccoli, frozen: from Mexico
- Chicken of the Sea packed Tuna: from Thailand
- Frank’s Red Hot Sweet Chili Sauce: from Thailand

**Buy American Corrective Action #1:** Develop and implement Buy American Non-compliant Product List for tracking non-domestic products that includes all necessary information. ***Please provide a copy of the updated form that will be used and include any non-compliant products currently in storage.***

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

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

- The consultant address financial topics with the Business Manager including how 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](http://dpi.wi.gov/nutrition/online-services) webpage (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 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, caterings and paid students participating in the WSDMP, 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 on 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) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter
  - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

### 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 SFA’s current weighted average price from the 2018-19 SY tool is \$2.96. Current weighted average price requirement is \$2.92.
- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.

- Refer to the [PLE 'In a Nutshell'](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf) 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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf) from DPI (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf).
- Refer to the most recent [guidance memo](https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf) 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) under Paid Lunch Equity (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

### **Findings and Corrective Action: Paid Lunch Equity**

❑ **Finding:** The PLE tool was completed incorrectly.

**Corrective Action Needed:** Please upload the corrected PLE tool to the online contract as corrective action.

### **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).

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

- 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) (<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) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

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

- **Finding:** The Nonprogram Foods Revenue Tool has not been completed for the current school year.  
**Corrective Action Needed:** Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool for Mauston, using a 5-day reference period ([https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html)).

#### **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.

## **2. GENERAL PROGRAM COMPLIANCE**

#### **Civil Rights**

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

#### **Nondiscrimination Statement**

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 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 training had been attended by all staff in the schools and documentation was available for review.

### 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. It was noted that meal prices for student meals (i.e., \$2.65, \$2.75, \$3.05) are visible on the computer screen that can be seen by students; this constitutes overt identification.

### 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 Civil Rights Division of USDA Food and Nutrition Service within five days. 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:** Sales screen of POS indicates prices of meals; this is overt identification.  
**Corrective Action Needed:** Correct this and send screen shot of breakfast and lunch meal sale for free, reduced and paid student.
- Finding #2:** District does not have a complaint policy for USDA child nutrition programs.  
**Corrective Action Needed:** Please provide a timeline for bringing this into compliance.
- Finding #2:** USDA nondiscrimination statement on food service letter sent to households has incorrect statement.  
**Corrective Action Needed:** Please reformat statement for the letter and send a statement of understanding that the USDA nondiscrimination statement must be in the prescribed format and in the same font size as the body of the letter.

### On-site Monitoring

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

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).
- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on our [Community](#)

[Eligibility Provision \(CEP\)](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) webpage, under the resources for currently participating sites section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

### 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](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 language regarding a required triennial assessment and updating/informing the public).

**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.

#### 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 Safety Plans

- The Food Safety Plan was available for review. The food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and 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](https://dpi.wi.gov/school-nutrition/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.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

### Food Employee Reporting Agreements

- All food 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.

### Time/Temperature Control for Safety (TCS) Food

Milk and dairy products  
Shell eggs  
Meat (beef, pork, and lamb)  
Poultry  
Fish  
Shellfish and crustaceans

Baked potatoes  
Heat-treated plant food, such as cooked rice,  
beans, and vegetables  
Tofu or other soy protein  
Sprouts and seed sprouts  
Sliced melons

Cut tomatoes  
Cut leafy greens  
Untreated garlic-and-oil mixtures

Synthetic ingredients, such as textured soy protein in meat alternatives

### 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.

### Sharing and No Thank You Tables

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

#### Sharing Table

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

#### No Thank You Table

A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, a designated worker or trained individual must inspect the items for wholesomeness.

Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.

#### Considerations

1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.

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

**Wholesome Leftovers (from Sharing and No Thank You tables)**

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

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

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

**Monitoring Log**

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

**Findings and Corrective Action: Food Safety**

- Finding #1:** Standard operating procedures (SOPs) are not site-specific.  
**Corrective Action Needed:** Remove or adapt SOPs to reflect site-specific procedures. Submit updated SOP Procedures Index as attachments to assigned DPI Nutrition Program Consultant via email.
- 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 via email.

- ❑ **Finding #3:** Most recent food safety inspection report is not posted in a publicly visible location at either school. As stated above, posting with the And Justice for All poster is a convenient way to ensure a public 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 via email.

- ❑ **Finding #4:** No sanitarian-approved SOP for sharing or no thank you tables.

**Corrective Action Needed:** Obtain sanitarian approval for applicable SOP. Submit copy of approved SOP with proof of sanitarian approval as an attachment to assigned DPI Nutrition Program Consultant via email.

**Note to reviewer: sanitarian approval is considered email documentation, a completed food safety plan review including the SOP, or a signature from the sanitarian.**

- ❑ **Finding #5:** Re-servicing of time/temperature control for safety food (TCS) as part of Child Nutrition Programs (CNP). Milk leftover from Breakfast in the Classroom is put out in cooler on sharing table for students for lunch.

**Corrective Action Needed:** Immediately discontinue re-servicing TCS foods as part of CNP. “Re-servicing” refers to the transfer of food that is unused and returned by a customer after being served and in the possession of the customer to another person. Submit updated SOP describing how TCS foods placed on sharing or no thank you tables will be handled following meal service as an attachment to assigned DPI Nutrition Program Consultant via email.

- ❑ **Finding #6:** Sharing table is not under direct supervision by trained adult.

**Corrective Action Needed:** Designate an adult to monitor and supervise the sharing table during meal service. Notify assigned DPI Nutrition Program Consultant of the job position that will supervise the table.

- ❑ **Finding #7:** No SOP for breakfast in the classroom, including use of insulated bags and carriers.

**Corrective Action Needed:** Submit SOP for BIC to reviewer as corrective action.

### **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 Mauston 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). Mauston is providing monthly breakfast reminders through the district newsletter and occasional radio spots. 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. USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months (even if the program is not offered in the district). Mauston does run the SFSP and has meal sites at multiple locations throughout the district and surrounding area. 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](#) 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)

### 3. OTHER FEDERAL PROGRAMS REVIEWS

#### Afterschool Snacks

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

- Each site participating in the Afterschool Snack Program needs to have an onsite monitoring review completed within the first four weeks of operation, and a second review within the school year. The review form to complete may be found on our [Afterschool Snack Program](#) webpage (<http://dpi.wi.gov/school-nutrition/after-school>).
- Area Eligible Afterschool Snacks are all claimed at the free rate.
- Each afterschool snack location is required to maintain documentation supporting that reimbursable meals were provided to students, including production records with snack items and serving size. Menus are not required, but encouraged. Production record examples are found on the afterschool snack program webpage linked above.
- Participating students are claimed by eligibility category (free, reduced, or paid) when a reimbursable snack is selected.
- Afterschool sites must provide educational or enrichment activities in an organized, structured, and supervised environment.
- [Snack Count Sheets](#) and [production record templates](#) are located on the Afterschool Snack webpage (<http://dpi.wi.gov/school-nutrition/after-school>).

#### Findings and Corrective Action: Afterschool Snack Program

- ❑ **Finding #1:** Onsite monitoring of the afterschool snack program was not completed.  
**Corrective Action Needed:** Complete the on-site monitoring form for this program and provide the completed form and provide a statement of understanding that this is required twice per year, the first within the first 4 weeks of the program start date.

#### Fresh Fruit and Vegetable Program (FFVP)

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

- As a reminder, nutrition education is essential to the success of the program but additional funding is not available through the grant to purchase nutrition education materials. Free materials can be ordered from the USDA's [Team Nutrition order form](https://pueblo.gpo.gov/TN/TNPubs.php) (<https://pueblo.gpo.gov/TN/TNPubs.php>). Other materials can be accessed through the [Wisconsin Team Nutrition](https://dpi.wi.gov/team-nutrition/nutrition-education) webpage (<https://dpi.wi.gov/team-nutrition/nutrition-education>).
- Classroom teachers are allowed to participate with the students in the FFVP snack but that they are the only adults that are allowed to. Teachers can be powerful role models for students. While eating the FFVP snack with students, teachers have the opportunity to model healthy eating behaviors. This can be an effective way to reinforce nutrition education lessons and encourage reluctant students to try the snack. However, teachers are not required to participate and no additional funding is provided in the grant for teachers. If a classroom has both a teacher and a teacher's aide, the teacher's aide can be permitted to participate in the FFVP snack in place of the teacher if they have direct involvement



with the students. See page 10 of the USDA's [FFVP Handbook](http://www.fns.usda.gov/sites/default/files/handbook.pdf) for more information (<http://www.fns.usda.gov/sites/default/files/handbook.pdf>).

- Offering a cooked vegetable can be allowable if certain criteria are met. This is mentioned on page 15 of the USDA's FFVP Handbook. The vegetable must be purchased fresh and cooked in house. Additional ingredients should not be added during the cooking process as the goal is still to connect students with the flavor of the actual vegetable. The vegetable that is cooked should be one that is not normally eaten raw and it must be offered as part of a nutrition education lesson. Cooked vegetables are limited to one time per week.

### **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.

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

- ❑ **Finding #1:** Inaccurate POS. Milks being claimed from morning order not as distributed.  
**Corrective Action Needed:** Correct the POS. Please provide a plan for counting/claiming milks as the student receives one.
- ❑ **Finding #2:** WSDMP contract on file is dated from 1993.  
**Corrective Action Needed:** Please complete a new, updated contract and submit to DPI as corrective action.
- ❑ **Finding #3:** Weighted average carton cost not used for cost determination.  
**Corrective Action Needed:** Please provide a statement of understanding regarding requirement of using weighted average cost for claim submission.

"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!*