

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

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**School Food Authority: Wonewoc Center School District Agency Code: 296713**

**School(s) Reviewed: Wonewoc High School**

**Review Date(s): January 15-16, 2019**

**Date of Exit Conference: January 16, 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 Wonevoc Center 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 the Wonevoc Center School District for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through a great salad bar and lunch and a comprehensive wellness plan. We were impressed with the great participation with the grab and go breakfast. Breakfast is such an important part of wellness and academic success. What a great way for students to start their day!

The DPI review team is confident that the Wonevoc Center School District will continue to improve their knowledge and operation of child nutrition programs.

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Certification and Benefit Issuance**

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

- 152 eligibility determinations were reviewed. There were no determination errors. There were two incomplete applications, missing the number of household members, Both applications were corrected onsite. Great job determining the correct benefit and extending benefits. Thank you for using the DPI prototype letters with the current non-discrimination statement and for providing application materials in Spanish as well as English.

##### **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.

##### **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>).

## Verification

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

The verification process was completed correctly. Thank you for using the DPI prototype letters with the current non-discrimination statement. See below for general reminders about verification.

- 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

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

- The meal counting and claim for the Review Month was conducted using the Accuclaim report. All meals claimed were correct; however, the meals for the middle school were claimed under the high school site and the high school meals were claimed under the middle school site.

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

- **Finding #1:** Meals were claimed under the incorrect site code.  
**Corrective Action Needed:** Please submit an [amended paper claim](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming>) for all claims submitted during the 18-19 SY, by the corrective action due date. Please submit to NPC the date this is completed. To modify an existing claim that has already been “paid” or “processed”, email the original or modified [site-based claim excel template](#) as an attachment to [jacqueline.jordee@dpi.wi.gov](mailto:jacqueline.jordee@dpi.wi.gov) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/blank-claim-site-upload.xlsx>).

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to the food service staff at Wonewoc Center School District for working to provide documentation prior to and as requested during the on-site review. Staff was friendly and professional. The willingness to learn and make changes as needed was evident. Thank you for all you do for the students at Wonewoc!

### Comments/Technical Assistance/Compliance Reminders

#### *Menu*

All components offered as part of a reimbursement meal should be listed on the printed menu. The January breakfast menu only indicates that milk and juice are offered in addition to the planned entrée. Please update to include that fruit is offered daily.

#### *Production Records*

Production records are intended to be useful tools to record information prior to production, during production, and following production. While there is no required template, the [production record](#) template found on our website can be helpful in ensuring that all of the [production record requirements](#) are met (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>).

Production records are documentation that reimbursable meals are served and must accurately reflect service. All items offered as part of the reimbursable meal must be documented.

When recording planned number of servings, OVS should be taken into consideration. For example, it is unlikely that you plan for all students to take the baked beans when they are offered. Therefore, using historical data, it is acceptable to forecast, plan and prepare fewer servings than the number of planned reimbursable meals, which will reduce food cost and waste.

- The total planned quantity should be sufficient for the planned number of servings, and if actual quantity prepared differs, be sure to document that.
  - On 12/3, there were 320 planned servings of green beans (unsure how many of these were 1 cup servings vs.  $\frac{3}{4}$  cup servings), with 9 #10 cans planned. However, 9 #10 cans only provides 101.925 cups of drained beans.

### **Documentation**

As a reminder, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the USDA *Food Buying Guide* for School Meal Programs. A complete CN label includes the following: CN logo, product name, ingredient statement and inspection legend. It is important to save actual CN labels from product packaging that include these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label. When a CN label is not available for a processed product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

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

Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in to reflect the products and practices that are used in you kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

### **Meal Pattern and Crediting**

There is no overlap in calorie requirements for the 6-8 and 9-12 grade groups. Therefore, it is necessary to continue ensuring that different portion sizes or menu offerings are provided for some items.

While there is no maximum for grains at breakfast, the recommended target maximum is 10 oz eq grain. The menu for the week of review had a maximum of 15.25 oz eq of grain. While this is acceptable, the likelihood of compliance with dietary specifications (calories, saturated fat, sodium) decreases with increased offerings. It is encouraged that the menu is planned with a maximum closer to the recommended target.

*Salad Bar*

Proper portion size utensils such as spoodles should be used instead of tongs. This helps to ensure the planned portion size is provided and students are selecting reimbursable meals. Additionally, when determining the appropriate serving utensil, choose the one that provides at least the minimum desired amount when a *full, level scoop* is used. Scant and heaping scoops should be avoided as it is very difficult to ensure consistent portions are provided.

- Develop and maintain documentation for the portion size needed to provide the desired weight/crediting for meat/meat alternate and grain items on the salad bar (chicken, ham, croutons, cheese, etc.). These items should then be served with the proper utensil or pre-portioned.
- It would be helpful to have all meat/meat alternate options credit the same. For example, if everything credited as 1 oz eq meat/meat alternate, students could be offered the option to select 2 choices.

Meat/Meat Alternate Option	Portion size needed to provide 1 oz eq
Chicken	1 oz by weight
Ham	1.22 oz by weight
Shredded cheese	1 oz by weight or ¼ cup
Cottage cheese	¼ cup
Uncrustable	1 each
Yogurt	4 oz by weight or ½ cup

- The PFS provided for the egg is not complete and cannot be used to credit the product towards meal pattern requirements. If you would use this product as a meat/meat alternate, please procure an acceptable PFS.
- Considering limiting the options offered on the salad bar to decrease the prep workload and food waste, as well as make it easier to ensure that meal pattern requirements are being met.
- Allowing students, especially at the high school level, to self-serve some or all items (particularly on the salad bar), can increase meal satisfaction, decrease food waste and allow labor to be used elsewhere.

Planned serving sizes for the salad bar are currently ½-1 cup. A single planned serving size should be set (this may vary by grade group) based on what the average student is expected to take. This is typically around 1/8 to ¼ cup per item as students usually select a variety of vegetables from the salad bar.

As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). The fact that spoodles, which are used to measure volume, are often referred to as a “4 oz spoodle” for example, makes this somewhat confusing. A 4 oz or ½ cup spoodle is actually 4 fl oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas).

A 2 oz hashbrown patty is being used. According to the USDA Food Buying Guide, a 2.25 oz patty is needed to credit as  $\frac{1}{4}$  cup of vegetable. Therefore, the 2 oz patty credits as  $\frac{1}{8}$  cup starchy vegetable. Additionally, when crediting using the Food Buying Guide, a 1.6 oz serving of baby carrots credits as  $\frac{1}{4}$  cup vegetable.

[Menu planning worksheets](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) are a great tool that can be used to ensure the planned menu meets all daily and weekly meal pattern requirements for the appropriate age group (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

### **School Breakfast Program**

Great job utilizing an alternative breakfast model by serving breakfast after the bell! This model seems to be working very well for your 6-12 students as the participation is great!

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

Finding #1: The production records provided show that the only fruit offered on 12/7 was a strawberry cup. As this credits as  $\frac{1}{2}$  cup fruit, it **did not fulfill the daily minimum fruit requirement** of 1 cup for 9-12.

**Corrective Action Needed:** Submit a written statement describing how the daily minimum fruit requirement for 9-12 will be met when strawberry cups are offered in the future (will they be offered 2 cups or another  $\frac{1}{2}$  cup fruit offering?) as well as your understanding that all items offered as part of the reimbursable meal must be documented on the production record.

Finding #2: Product record requirements are not being fully met. A list of ("[Must Haves and Nice to Haves](#)") and sample production record templates can be found on our [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). Note: look at the updated two grade-group production record template to ensure necessary information is documented and eliminate unnecessary columns.

- Planned/actual number of servings must be separated by grade group (K-8/9-12 or K-5/6-8/9-12)
  - Actual number of salad bar entrees by grade groups should also be documented
- Leftovers must be documented on the main line and salad bar
  - This will aid in accurate forecasting

**Corrective Action Needed:** Submit one week of completed production records (breakfast, lunch and salad bar) that are in compliance with all production record requirements.

Finding #3: The salad bar is offered as an entrée and students selecting salad bar do not have access to any offerings on the main line. Two vegetable subgroups were missing from the salad bar line during the week of 12/3-12/7, starchy and beans/peas. Note that this is a repeat finding, and these same subgroups were missing from the salad bar line during the previous Administrative Review. As this is a repeat violation, it is subject to fiscal action for all grades that had access to the salad bar.

Additionally, there was a **red/orange vegetable subgroup shortage** on the salad bar line. Diced tomatoes were the only planned red/orange vegetable on the salad bar for the week of 12/3. They were offered daily in a 2T planned serving, for  $\frac{5}{8}$  cup over the week. This is short of the  $1\frac{1}{4}$  cup weekly requirement for 9-12.

**Corrective Action Needed:** Submit a written statement outlining the specific changes that will be made to the menu and/or meal service to correct these shortages. The production records requested in the previous finding will also be reviewed for compliance with subgroup requirements.

Some options to consider include:

- Allowing *all* students to have access to the vegetables on the salad bar AND on the main line.
  - If you still wanted to offer a salad bar entrée option, the meat/meat alternate and grain offerings could be made available only to those students selecting the alternate entrée. (having these items pre-portioned could help make this easier)
  - Alternatively, you could not offer any additional meat/meat alternate or grain items and just have additional fruit/vegetable offerings that anyone could select as part of their meal.
- Allowing students selecting the salad bar to also have access to vegetables offered on the main line
- Ensuring that all vegetable subgroup requirements are being met on the salad bar line
  - If you select this option, be specific and indicate the day, item and portion size that you plan to add to the menu (ex. offer 1/8 cup of chickpeas daily).

**□ Finding #4:** The planned salad bar menu on 12/6 only offered 1.5 oz eq of grain (1 oz eq from the Uncrustable and 0.5 oz eq from the ¼ cup of croutons), which resulted in a daily grain shortage at lunch for 9-12. This grade group must be offered a minimum of 2 oz eq of grain daily. As this is a repeat violation, it is subject to fiscal action for the 9-12 students selecting the salad bar option on 12/6.

**Corrective Action Needed:** Submit a written statement outlining the changes that will be made to the menu to correct this shortage. Be specific and indicate the item and portion size that you plan to add to the menu (ex. offer a 1 oz slice of bread in addition to the Uncrustable) The production records requested in the previous finding will also be reviewed for compliance with daily grain minimums.

**□ Finding #5:** Signage is posted and filled in with the breakfast and lunch menus daily. However, it does not include the requirement that students select at least ½ cup fruit and/or vegetable as part of their reimbursable meal. Additionally, it is not very instructional for breakfast as it does not indicate how many *food items* each menu item is planned as.

Supplemental signage should be posted or a new template used. Samples of signage that can be printed or updated and used in your school 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). If you are interested in ordering signage from SNT, please visit the [Team Nutrition](https://dpi.wi.gov/team-nutrition) webpage and complete the Resource Order Form, under the Resources heading (https://dpi.wi.gov/team-nutrition).

**Corrective Action Needed:** Submit a picture of the new or supplemental signage posted.

***Please note that repeat violations involving food quantity shortages on future Administrative Reviews may result in fiscal action.***

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

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

### 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.
- 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 “Purchased Services” report any time you pay someone for services provided such as equipment repair and health inspections.
  - Under “nonprogram foods”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
  - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

### Unpaid Meal Charge Policy

There is information relating to negative accounts/unpaid meal policy in Section: 8000 Operations, Title: Food Services and Section: 6000 finances, Title: Student Fees, Fines and Charges. This policy is not clear and is not being followed.

USDA Policy Memorandum SP 46-2016 requires all School Food Authorities (SFAs) operating federal school meal programs to have a written and clearly communicated policy to address unpaid meal charges by July 1, 2017. For more information refer to [Best Practice Manual from USDA Memo SP 29-2017](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-29-2017a2.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-29-2017a2.pdf>) and the DPI School Nutrition financial management section for more tools about the [Unpaid Meal Charge Policy](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

- Unpaid Meal Charge Policy
  - Must explain how the SFA will handle situations where children eligible to receive reduced price or paid meals, do not have money in their account or in hand to cover the cost of their meal at the time of service. Describe when and if an alternate meal will be provided or a meal will be denied.
  - Should be implemented and enforced SFA-wide although, the policy may vary based on



- student grade level.
- Must be provided in writing (mail, email, registration packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school district during the school year. Simply posting the policy to the school website does not meet the requirement.
- Must be provided in writing to all school or SFA-level staff who are responsible for policy enforcement.

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

- **Finding #2:** The SFA’s current Unpaid Meal Policy is not clear and is not being followed.  
**Corrective Action Needed:** Please develop a timeline for a written unpaid meal charge policy that contains the information above. Please also, submit a statement that you have communicated the new policy to staff who are responsible for policy enforcement.

**Revenue from Nonprogram Foods**

**Commendations/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.
- WSDMP paid milks go under nonprogram foods revenue and expenses.
- 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.

**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)
- [Nonprogram Food Revenue Webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#nfr) (https://dpi.wi.gov/school-nutrition/training/webcasts#nfr)

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

- **Finding #3:** The Annual Financial Report does not have revenues or expenses allocated correctly to nonprogram foods. The SFA provides catering and adult meals. The revenues and expenses need to be accurately broken out on invoices for accurate allocation.  
**Corrective Action Needed:** Submit a statement of how food/supplies for nonprogram foods will be coded on invoices so they can be properly allocated on the annual financial report.
- **Finding #4:** Many items are being sold at invoice cost when all costs for nonprogram foods, including food, labor, equipment, and purchased services must be covered so student meals are not subsidizing nonprogram foods. The nonprofit foodservice account cannot be used as a ‘pass-thru’ account.

**Corrective Action Needed:** Set a standard markup and price list for all items supplied to entities outside of foodservice.

#### 4. GENERAL PROGRAM COMPLIANCE

##### Civil Rights

##### Commendations/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.

##### 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.

##### 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 or the child’s I.E.P. SFAs are recommended to use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- 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 to have a signed statement from a parent or guardian on file. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. These types of accommodations must be 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 also 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.
- 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>)
- It is recommended that the SFA develop a policy for handling special dietary accommodations to ensure that requests are equitable for everyone.

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

- **Finding #5:** The person responsible for benefit issuance has not completed the required School Nutrition Civil Rights Training.  
**Corrective Action Required:** Please watch the USDA Civil Rights Training for frontline staff Powerpoint Presentation. Please submit the signed attendance record.
- **Finding #6:** The Special Dietary substitution section of Policy Section: 8000 Operations, Title: Food Services needs to be updated to better reflect current requirements and current practice.  
**Corrective Action Required:** Please submit a timeline for when this policy will be updated.

### **On-site Monitoring**

#### **Commendations/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.
- Because St. Paul's School is under an Alternative School Food Authority Agreement it is considered a site for the Wonewoc Center School District. Therefore, onsite monitoring needs to be completed for Wonewoc Center Schools and St. Paul's school. Complete the onsite monitoring form for all lunch sites and 50% of breakfast sites. Onsite monitoring must be completed by February 1 each school year.

### **Local Wellness Policy**

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

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

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

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

#### 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)).

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

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

- **Finding #7:** The SFA LWP does not contain information regarding food and beverage marketing as stipulated in the Local Wellness Policy final rule. Best practice would be to also add a statement regarding food and beverage marketing to Policy section: 9000 Relations, Title: Advertising and Commercial Activities such as “all food or beverage products depicted on items/equipment on the school campus, during the school day, must meet Smart Snacks nutrition standards”.

**Corrective Action Required:** Please submit a timeline for updating the Wellness Policy to include food and beverage marketing.

### **Smart Snacks in Schools**

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

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 if they do not qualify for an exemption.

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but this may not occur in the meal service area during meal service times.

There is no required template that must be used to track fundraisers or products sold that are subject to Smart Snacks standards. However, tracking tool templates are available on the [Smart Snacks page](#) of our website and may be helpful in tracking this information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). Locations where exempt fundraisers occur, must be documented to ensure compliance with the regulation.

#### ***Vending***

There are two vending machines in the building. Both were off during the review, however, please keep the following guidance in mind:

- The machine downstairs contains Pepsi, Diet Pepsi, Mt. Dew, Diet Mt. Dew, Mug, Gatorade, G2, Cherry Pepsi and Mt. Dew Ice. This does not meet Smart Snacks standards for any grade group and must remain off during the school day\*
  - *Note: USDA defines “school day” as: the period from the midnight before to 30 minutes after the end of the instructional school day.*
- The machine upstairs contained the following:
  - G2 (20 fl oz, 50 calories)– allowable for high school only
  - Gatorade – not allowable for any grade group
  - Propel – allowable for high school only
  - Bubbl’r – allowable for high school only
  - 100% juice, 15.2 fl oz – not allowable for any grade group

Therefore, this machine should remain off during the school day unless the Gatorade and juice are removed. If filled with beverages compliant for high school only, signage should be posted clearly communicating that only 9-12 students may purchase items from the machine during the school day (as defined by USDA).

The [Smart Snacks in a Nutshell](#) document provides a great overview and summary of the general standards, nutrient standards and allowable beverages for your reference (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).

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

Finding #1: One exempt fundraiser has taken place this school year (bake sale). However, documentation for this fundraiser was not provided during the on-site review.

**Corrective Action Needed:** Submit documentation showing that this fundraiser was properly tracked, including information such as the student organization, dates, items sold, location, etc.

### **Food Safety and Storage**

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

##### Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- All schools, including St. Paul's, 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.

##### Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](#) 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.
- Foodservice employees at St. Paul's must have signed Food Employee Reporting Agreement forms on file.

### **Buy American**

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

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

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

- Labels should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, the SFA must get certification from distributor or supplier stating: "We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the [SNT Procurement webpage](http://dpi.wi.gov/school-nutrition/procurement/buy-american) (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

The following products were found without a clear country of origin indicated on the product or product packaging. This will be treated as technical assistance for the 2018-19 school year, but work with your distributor/supplier to move toward compliance.

- BBQ sauce
- Western french dressing
- Corn (not sure if this was a USDA product)
- Bush's baked beans
- Poptarts
- Apple juice (labeled as USA, Germany, Hungary, Chile and/or China)
- Tri-taters

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

**❑ Finding #1: While reviewing product storage for compliance with the Buy American provision, cucumbers and green peppers from Mexico were found.**

**Corrective Action Needed:** Submit [documentation](#) for an exception to the Buy American provision for the cucumbers and green peppers or documentation for domestic products that will be used in their place (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

If you have additional questions regarding the Buy American provision, please contact Alex Zitske ([alex.zitske@dpi.wi.gov](mailto:alex.zitske@dpi.wi.gov) or 608-267-9822) to discuss further and ensure that procurement, monitoring and tracking are being done properly.

### **Reporting and Recordkeeping**

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All records pertaining to foodservice must be kept for 3 years plus the current year with the exception of temperature records. These records should be kept a minimum of six months or until your next county health inspection.

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

##### **Commendations**

- Thank you for providing outreach for the School Breakfast Program. School nutrition plays an important role in the health and academic success of children and starting out the day with a breakfast meal is key to that success. Thank you also for providing outreach for summer meals to help ensure all students have access to meals year round.

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Afterschool Snacks**

#### **Commendations/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](http://dpi.wi.gov/school-nutrition/after-school) webpage (<http://dpi.wi.gov/school-nutrition/after-school>).
- Area Eligible Afterschool Snacks are all claimed at the free rate. For non-area eligible sites, participating students are claimed by eligibility category (free, reduced, or paid) when a reimbursable snack is selected.
- 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. [Snack Count Sheets](#) and [production record templates](#) are located on the Afterschool Snack webpage (<http://dpi.wi.gov/school-nutrition/after-school>).
- Afterschool sites must provide educational or enrichment activities in an organized, structured, and supervised environment.

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

- **Finding#8:** The 18-19 School Nutrition contract shows participation in the Afterschool Snack Program (ASP) at the elementary and middle school sites. There have been no claims filed for these programs.

**Corrective Action Required:** Please submit a timeline for when ASP claims will begin or remove the ASP from your contract.

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

**Commendations/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.

“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!*