

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

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**School Food Authority: Shullsburg School District**

**Agency Code: 335362**

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

**Review Date(s): April 2-3, 2019**

**Date of Exit Conference: April 3, 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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, 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, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

## Appreciation/Commendations/Noteworthy Initiatives:

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

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

24 Applications were reviewed, and no Benefit Issuance errors were found.

#### 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](#) one would look at the amount of their income under the column indicating that 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.

#### Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at [karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov) for more information and approval.

#### 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.

#### 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 the 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. 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.

#### Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

#### 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.

### 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.

### Direct Certification

- As a reminder, you are required to run direct certification 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.

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

Technical Assistance was provided for processing and determining applications, and knowing what a complete application should look like. Reviewing the paper and electronic applications together was helpful.

Also recommended was to look over the applications a second time to check for mistakes, or if a phone call needs to be made to the family. Date and initial on app anytime a phone call is made, or any adjustment is made.

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

**Finding #1:** There are no errors in Benefit Issuance. Nothing further needed.

### Verification

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

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

**Findings and Corrective Action Needed: Verification**

There were no errors in the Verification process, and the report was submitted on time.

**Meal Counting and Claiming**

There was 1 Non-Reimbursable meal observed at the lunch meal service. The staff person at the computer was unsure of what made a reimbursable meal, due to the high amount of extras on the menu being served that day. Technical Assistance was given to staff and the director to explain and understand more regarding the daily menu reimbursable meals and combinations to make a meal.

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

- Meals may only be charged to a student at the time of 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 was conducted perfectly.
- Please note that SFAs may claim visiting students in the paid category or the individual’s category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

**2. MEAL PATTERN AND NUTRITIONAL QUALITY**

**Comments/Technical Assistance/Compliance Reminders**

**Training:** The 2019 School Nutrition Skills Development Courses (SNSDC) dates and locations have been released. Registration and class schedules will be posted to the website in early May. Please visit the [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage for more information (https://dpi.wi.gov/school-nutrition/training#up).

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

**Weight vs. Volume:**

	Measures	Measured In	Conversions	Tools Used
<b>WEIGHT</b> <i>how heavy is it?</i>	Meat/meat alternates, Grains	<b>Ounces (oz)</b> Grams (g) Kilograms (kg) Pounds (lb or #)	1 oz = 28 g 1 lb = 16 oz	Scale

<b>VOLUME</b> How much space does it take up?	Fruits, Vegetables, Milk	<b>Fluid ounces (fl oz)</b> Tablespoon (T or TBSP) Teaspoon (t or tsp) Cups (c) Pint (pt) Quart (qt) Gallon (gal) Liter (L)	3 tsp = 1 TBSP 16 TBSP = 1 c 1 c = 8 fl oz 1 pint = 2 c 1 quart = 2 pints 1 gallon = 4 quarts	Spoodles, measuring cups, measuring spoons, scoops, dishers, ladles
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**\*WEIGHT AND VOLUME ARE NOT EQUAL OR INTERCHANGEABLE... OUNCES ≠ FLUID OUNCES**

**Seconds:** Discontinue the practice of offering second servings free of charge to high school students. Offering second servings complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly averages. If students are still hungry, second servings may be sold a la carte.

**Resources:** The following are links to helpful resources we recommend bookmarking and/or printing

- [Lunch “In a Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf) (paper copy provided on site)
- [Lunch Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) (paper copy provided on site)
- [Breakfast “In a Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-in-a-nutshell.pdf) (paper copy provided on site)
- [Breakfast Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf) (paper copy provided on site)
- [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) (paper copies provided on site)
- [Instructions for completing production records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) (paper copy provided on site)
- [USDA Food Buying Guide for Child Nutrition Programs \(FBG\)](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs)
- [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (paper copy provided on site)
- [Crediting in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf) (paper copy provided on site)
- [Vegetable Subgroups](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) (paper copy provided on site)
- [Crediting fruits and vegetables](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) (paper copy provided on site)
- [Standardized Recipe template for 2 grade groups](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-multiple.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-multiple.doc) (paper copy provided on site)
- [Garden bar and condiment production records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/garden-bar-condiment-record-one-grade-group.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/garden-bar-condiment-record-one-grade-group.xlsx) (paper copy provided on site)

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

**\*\*Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.**

**\*\*□ Finding #1: Meal pattern non-compliance; shortages during the week of review**

Lunch

- A. Daily and weekly fruit shortage (The K-8 meal pattern requires ½ cup fruit to be available daily and 2.5 cups weekly at lunch with no more than 50% in the form of juice)
- Monday: ¼ cup apple slices
  - Tuesday: ¼ cup oranges (2 wedges)
  - Wednesday: ¼ cup mango
  - Thursday: ¼ cup kiwi
  - Friday: ¼ cup grapes
  - TOTAL: 1.25 cup of fruit
- B. Weekly bean/pea (legume) vegetable subgroup shortage (The K-8 meal pattern requires ½ cup bean/pea (legumes) to be available weekly at lunch)
- Thursday: ¼ cup baked beans
- C. Daily grain shortage (The K-8 meal pattern requires 1 oz eq grain to be available daily at lunch and 8 oz eq weekly)
- Monday: ½ oz eq rice (2 fl. oz. or ¼ cup)
- D. Weekly grain compliance at lunch cannot be assessed until crediting documentation for chicken patty, dinner roll, and sliced bread is submitted
- E. Daily and weekly meat/meat alternate compliance at lunch cannot be assessed until crediting documentation for chicken patty, Salisbury steak, and sliced turkey is submitted

Breakfast

- A. Daily and weekly fruit shortage at breakfast (The K-8 meal pattern requires 1 cup fruit to be available daily and 5 cups weekly at breakfast with no more than 50% in the form of juice)
- Monday: ½ cup apple juice, ¼ cup pears = ¾ cup
  - Tuesday: ½ cup applesauce
  - Wednesday: ½ cup fruit punch, ¼ cup fruit cocktail = ¾ cup
  - Thursday: ½ cup grape juice, ¼ cup peaches = ¾ cup
  - Friday: ½ cup orange juice, ¼ cup mandarin oranges = ¾ cup
  - TOTAL: 3.5 cups of fruit (>50% as juice)
- B. Daily and weekly grain compliance at breakfast cannot be assessed until crediting documentation for Cinna Buns/French toast, cheese omelet, and sliced bread is submitted

**Corrective Action Needed for Finding #1:**

The following webcasts must be reviewed by the food service staff at Shullsburg:

- [Fruit](https://dpi.wi.gov/school-nutrition/training/webcasts#fruit) (https://dpi.wi.gov/school-nutrition/training/webcasts#fruit)
- [Vegetable](https://dpi.wi.gov/school-nutrition/training/webcasts#veg) (https://dpi.wi.gov/school-nutrition/training/webcasts#veg)
- [Grains](https://dpi.wi.gov/school-nutrition/training/webcasts#grains) (https://dpi.wi.gov/school-nutrition/training/webcasts#grains)
- [Meat/meat alternate](https://dpi.wi.gov/school-nutrition/training/webcasts#meat) (https://dpi.wi.gov/school-nutrition/training/webcasts#meat)
- [Milk](https://dpi.wi.gov/school-nutrition/training/webcasts#milk) (https://dpi.wi.gov/school-nutrition/training/webcasts#milk)

- [The Lunch Meal Pattern](https://dpi.wi.gov/school-nutrition/training/webcasts#lunch) (https://dpi.wi.gov/school-nutrition/training/webcasts#lunch)
- [Breakfast](https://dpi.wi.gov/school-nutrition/training/webcasts#sbp) (https://dpi.wi.gov/school-nutrition/training/webcasts#sbp)
- [Product Formulation Statements](https://dpi.wi.gov/school-nutrition/training/webcasts#pfs) (https://dpi.wi.gov/school-nutrition/training/webcasts#pfs)
- [Portion Control](https://dpi.wi.gov/school-nutrition/training/webcasts#pc) (https://dpi.wi.gov/school-nutrition/training/webcasts#pc)
- [Production Records](https://dpi.wi.gov/school-nutrition/training/webcasts#pr) (https://dpi.wi.gov/school-nutrition/training/webcasts#pr)
- [Standardized Recipes](https://dpi.wi.gov/school-nutrition/training/webcasts#sr) (https://dpi.wi.gov/school-nutrition/training/webcasts#sr)

Submit a list of each webcast/resource watched/reviewed with the date and time spent viewing it. Include the name of each staff member present. Please send any summaries or notes made while viewing the webcasts/resources. Contact the PHN with follow-up questions.

Submit a completed [K-8 lunch](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc) and [K-12 breakfast menu planning worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx) for an upcoming week (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx). Ensure that all minimum requirements are met.

Please provide crediting information for the requested products by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the products. If proper documentation cannot be obtained, you should discontinue using these products for school meals and submit crediting documentation for the selected substitution item.

#### ❑ Finding #2: Production records

Production records are intended to be useful tools to record information prior to production, during production, and following production. The production record template currently in use does not have the following required pieces of information recorded:

- Serving site (eg, Shullsburg)
- Menu type (eg, Lunch)
- Grade groupings (eg, K-8 or 9-12)
- Menu item with recipe name/reference number or product name/description
- Planned serving size for each grade group (eg, ½ cup, 1 each, 5 pieces, 2 ounces, etc.)
- Planned/actual number of servings prepared
- Planned serving sizes and usage for condiments and any extra menu items
- Number of non-reimbursable (adult) meals planned and served

While there is no required production record template, there are some examples that may be used on our Production Records webpage (see resources above). Production records personalized for Shullsburg School District were provided on site.

**Corrective Action Needed for Finding #2:** Send one 5-day week of completed breakfast and lunch production records for all grades served at Shullsburg. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.

#### ❑ Finding #3: Offer versus serve

One student selected a non-reimbursable meal during lunch meal observation on 4/2/2019. The student's meal contained 1 oz eq rice, ¼ cup (two quartered wedges) oranges, and ¼ cup (two sticks) carrots. A reimbursable must contain 3 different components in their full quantity, including ½ cup of fruit and/or vegetable. Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.



Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements. It is important for staff to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](#) and the [Offer Versus Serve Webcast](#) can be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>; <https://dpi.wi.gov/school-nutrition/training/webcasts>).

**Corrective Action Needed for Finding #3:** Have staff responsible for determining reimbursable meals attend a training on OVS. The [lunch meal pattern](#) and [OVS webcast](#) may be used, or another training of your choosing (<http://dpi.wi.gov/school-nutrition/training/webcasts#lunch>; <http://dpi.wi.gov/school-nutrition/training/webcasts#ovs>). Please submit details regarding when and where the training was held, who attended, and how the training was conducted.

#### ❑ Finding #4: Salad bar and extra items

Produce on a salad bar can credit toward the meal pattern each day that it is offered to students (e.g., if black beans are offered daily with a planned serving size of 1/8 cup, then 5/8 cup has been offered in total each week and meets the minimum 1/2 cup requirement of beans/peas). Even with salad bars, the menu planner must plan a specific portion size that he or she intends students to take. If the fruits or vegetables on the salad bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as 1/2 of the volume served.

Production records must be kept for a salad bar. Production record templates for salad bars are available on the Production Records webpage. A Vegetable Subgroups handout is also available (see resources above).

Additional signage on a salad bar can assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a [Salad Bar Signage Template](#) with pictures that can be posted on a salad bar (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

Dishes of “extra” items are offered without proper portioning utensils. Students are free to take these items as “extras”. Usage is not monitored nor are portion sizes communicated to students. **At this time, it is recommend that Shullsburg only implement a salad bar with creditable vegetables. It is strongly advised that you discontinue offering croutons, chow Mein noodles, pasta salads, sunflower seeds, cottage cheese, craisins, raisins, hard boiled eggs, and shredded cheese.** These foods must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium) and add to the cost of the meal. Without portion control, it is difficult to credit these items toward the meal pattern.

**Corrective Action Needed for Finding #4:** Please submit a written plan of action that will be taken to limit “extra” offerings. Explain what will be done to control the calories, sodium, and fat of “extra” offerings daily. Submit one 5-day week of completed salad bar production records, including any condiments or “extra” items.

#### ❑ Finding #5: Standardized recipes

Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact

procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). Standardized recipes are needed for the grilled cheese sandwich and turkey and cheese sandwich offered during the week of review.

**Corrective Action Needed for Finding #5:** Submit standardized recipes for the grilled cheese sandwich and turkey and cheese sandwich offered during the week of review.

*Once the Public Health Nutritionist has all crediting documentation for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.*

## SMART SNACKS

### Comments/Technical Assistance/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. More information is available on the [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).

**Defined school day:** The school day is defined as beginning at midnight and ending thirty minutes after the end of instruction.

**Smart Snack standards:** Entrées, snacks, and sides must meet one of the following criteria: be a whole grain-rich product; have a fruit, vegetable, dairy product, or protein food (meat, beans, poultry, etc.) as the first ingredient; or be a combination food with at least ¼ cup fruit and/or vegetable. Nutrient standards should be assessed for the serving size available for purchase and include all accompaniments.

**Determining product compliance:** DPI SNT recommends using the Alliance for a Healthier Generation Smart Snacks Product Calculator (<https://foodplanner.healthiergeneration.org/calculator>) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records. Stapling a complete nutrition facts label with ingredient statement to the printout is a best practice.

**Exempt fundraisers:** The Wisconsin Department of Public Instruction (DPI) 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 sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented.

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

### ❑ Finding #1: Vending machine

A sample of products in the FFA vending machine were assessed for Smart Snack compliance. Several items did not meet Smart Snack standards. For example:

- Fritos contained 320 calories (exceeds calorie limit)
- Chocolate milk contains 380 calories and 570 mg sodium (exceeds calorie and sodium limits)
- Jack Links Beef Steak contains 640 mg sodium (exceeds sodium limits)

**Corrective Action Needed for Finding #1:** Submit Smart Snacks compliance documentation (e.g. complete nutrition facts labels with ingredient statements or Smart Snacks Calculator printouts, if available) for all foods and beverages sold in the vending machine. Submit a signed statement agreeing to remove non-compliant products from the vending machine. Submit Smart Snacks compliance documentation for any substitution items selected.

### ❑ Finding #2: Exempt fundraisers not tracked

Documentation is required for school fundraisers. A staff member at each school must be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. Templates, such as the [Exempt Fundraiser Tracking Tool](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smartsnacks), are available on the Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smartsnacks>).

### **Corrective Action Needed for Finding #2:**

Submit a summary outlining who will be responsible for oversight of Smart Snack regulations and tracking of food-based fundraisers within Shullsburg School District. Please submit a completed tracking tool for fundraising done during 2018-2019. If applicable, please address how current or planned food based fundraising sales not meeting Smart Snack standards will be made to comply with these regulations. Use the Smart Snacks in a Nutshell to review the guidelines (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf>).

## BUY AMERICAN

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

#### ❑ Finding #1: Non-compliant items

The following non-domestic items were found in storage without supporting documentation:

- Bell peppers from Mexico
- Cucumbers from Mexico
- Ardmore Juice cups
- Frozen California blend vegetables from Mexico
- Canned pineapple from Indonesia

**Corrective Action Needed for Finding #1:** Please submit a copy of completed non-domestic documentation for products identified above, as well as any other products found in inventory. A suggested [Buy American - Non Compliant Product List template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) can be found on the [Buy American webpage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

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

##### Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and 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 our 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”.
- 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” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “Ala Carte”, you should be reporting 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 would also be included here.
  - When revenues are recorded from the federal reimbursement payments, you want to 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 a food expenditure.

##### Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.

- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

### Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>)
  - 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>).

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

**□ Finding:** Technical Assistance was given to the bookkeeper regarding Skyward software. Currently the balances of the students accounts do not show up on the computer. It was advised to put those back on so the POS staff member can see them. The breakfast and lunch prices will remain at \$0.00 to prevent any overt identification. This way the staff member can tell students who have a negative balance that they cannot purchase extra items.

**Corrective Action Needed:** Add on to Skyward software, the student balances so they show up during meal service at the Point of Service. Nothing further needed.

### **Paid Lunch Equity**

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

Thank you for completing the tool in past years and adhering to the pricing requirements. Thank you for completing the PLE Survey as well. For the 18-19 school year, schools were not required to complete the PLE tool if they retained a positive balance in Fund 50 Food Service. Shullsburg School District retains a positive balance in their food service account, and therefor did not have to raise prices for meals this school year. Nothing further is needed.

## Indirect Costs

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

#### Findings and Corrective Action Needed: Indirect Costs

The Food Service Fund 50 is being charged for water use in the kitchen. Currently there is a meter in place to monitor the usage. This is also being documented and records kept in compliance with the record retention rule. Nothing further needed.

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

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

Civil Rights is being done annually and an attendance roster is being kept. This training can also be applied towards Professional Standards.

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

**Finding:** There are no findings. Nothing further needed.

### On-site Monitoring

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

This is not needed due to one building and only one main kitchen.

### Local Wellness Policy

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

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>).

**Technical Assistance for 1006, if do have a 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 a plan to improve upon the results of the assessment.

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

❑ **Finding:** Your SFAs Local Wellness Policy does not contain language for all the minimum required elements stipulated above (1000). An annual review of this policy is crucial to be sure that the goals of the policy are being met, and any changes needed are inserted into the policy.

**Corrective Action Needed:** Please provide a timeline for updating your policy to become compliant with the final rule. The [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) can assist with sample language (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>).

### **Catering**

The Head Start Program is renting space from Shullsburg school district for their program of two days per week. They are not enrolled in the NSLP meal program, however they do pay for breakfast and lunch. These meals are not being claimed.

❑ **Finding:** Currently this revenue is recorded on the Annual Financial Report as “Other”. It needs to be placed under Non-Program Foods column.

**Corrective Action Needed:** The bookkeeper should list the Revenues and Expenses on the Annual Financial Report under the heading of Non-Program Foods. Send me an email to show that.

### **Professional Standards**

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

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

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- 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, 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.
- 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.

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

❑ **Finding:** Training is occurring on a regular basis and the correct amount of hours is being documented. However, it is not being monitored on a tracking tool. It would be better organized if all training for Food Service staff was on the same tracker. This is how it is intended to be.

**Corrective Action Needed:** Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action. Send copy of tracker to consultant.

### **Water**

#### **Commendations/Comments/Technical Assistance/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.

Water is being provided via a water fountain inside the cafeteria.

### **Food Safety**

#### **Commendations/Comments/Technical Assistance/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)). While you're at it, visit the [Office of Food Safety](#) website ([www.fns.usda.gov/ofs/food-safety](http://www.fns.usda.gov/ofs/food-safety)) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

#### **Food Safety Inspections**

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is 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.

### **Findings and Corrective Action Needed: Food Safety and Buy American**

❑ **Finding #1:** There was not an actual Food Safety Binder available for review. Documents were not organized. It was recommended to put one together with the current HACCP Food Safety Plan available on the DPI website. One was printed off for the director. The consultant on review is helping with putting a binder together with divider tabs so the director can insert important required information and have available for staff and himself to use on a daily basis. This binder is to be available for staff to look at and not kept in a locked office.



**Corrective Action Needed:** After the binder is assembled, the director should go over it with staff, and keep on site. This is a good refresher for an in-service at the beginning of each school year. It can also count towards Professional Standards hours.

❑ **Finding #2:** It was noted that there is a bucket for students to put unopened items from their trays into if not being consumed. These items are being re-used.

### **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 this 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.

### **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

## Sharing and No Thank You Tables

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

### Sharing Table

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

### 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.**

1. 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.
2. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
3. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
4. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).
5. **Wholesome Leftovers**

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

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

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

### 6. Monitoring Log

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

**Finding #3:** No sanitarian-approved SOP for sharing or no thank you tables.

**Corrective Action Needed:** IF decided to do, 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.

**Finding #4:** Re-servicing of time/temperature control for safety food (TCS) as part of Child Nutrition Programs (CNP).

**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 #5:** 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.

Reporting and Recordkeeping

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

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner. Records are being kept on file for 3 yrs plus the current school year.

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

##### Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Shullsburg. USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

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

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

Shullsburg is considering making Summer Meals this 18-19 upcoming summer. A meeting is being held after this DPI Administrative Review at the end of the week to decide if they will move forward with this. The district is aware of the need for the contract, etc with DPI before starting that program/.

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

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

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

- Wisconsin School Day Milk Program requires the distribution of free milk to free and reduced priced students in K-5.
- Point of Service Counts (POS) for the Wisconsin School Day Program and the Special Milk Program must be recorded by who “did” take milk not by marking who “did not” take one.
- Per the Agreement 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 you may want to include that stipulation in your milk bid.

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

The Wisconsin School Day Milk Program is being operated at Shullsburg School District. In observing 3 classrooms, and talking with each teacher, the Point of Service is being done correctly. All teachers were on board with wanting to ensure it was being implemented according to USDA guidelines and policies. Great job!

“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).”

