

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

School Food Authority: Athens School District

Agency Code: 37-0196

School(s) Reviewed: Athens High School

Review Date(s): January 15-17, 2019

Date of Exit Conference: 1/17/19

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).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Athens School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. Everyone was very friendly, helpful, and 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.

Thank you to the Food Service Director for staying after hours to make sure everything was taken care of for the review. The DPI review team appreciates the eagerness of the Food Service Director, Superintendent, and the Food Service employees for their willingness to make changes to meet School Nutrition Program regulations.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

The total number of eligibility determinations reviewed was 112. Of those determinations, there were 9 errors.

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.

Household Size Box

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

Incomplete Applications

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

Effective Date of Eligibility

- The start date of eligibility is always the date the application is approved by the Determining Official.
- SFAs may establish the date of submission of an application (stamp received) 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. You must receive prior approval from Karrie Isaacson to use this flexibility. You can contact her at karrie.isaacson@dpi.wi.gov for more information and approval.

Carryover

Carryover of meal benefits from the prior school year is allowable until the 30th operating day in the school year unless a Free and Reduced Meal Application has been submitted (approved or denied) or the student was coded on Direct Certification for any code except an N code. In those cases, carryover stops when a new meal determination has been made.

Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced->

applications#apps). The purpose is to inform the public that free and reduced price meals are available.

- SFAs must annually distribute the Public Release to three of the following places:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need such as laundromats, social service agencies, libraries, grocery stores, WIC offices, food pantries, senior centers, physician offices/clinics, Community Action Program Agencies)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed. You may request the public release to be published as a public service.

Direct Certification

- As a reminder, you are required to run direct certification with the full enrollment for the district a minimum of four times a year: at or near the beginning of the school year, three months after the initial run, six months after the initial run, and in March.
- A best practice is to run Direct Certification monthly and when a new student transfers into the district.
- Direct Certification (DC) was run on 8/24/18, 9/8/18, and 10/18/18.
- The effective eligibility date for a DC eligible student is the date of the original output file of the day that Direct Certification was completed.
- On the Benefit Issuance list, many students that were Directly Certified Free or Reduced show a start date of eligibility of 9/4/18 or 10/19/18. However, the start date should be the date Direct Certification was run, not the date the output file was uploaded to the student information software.

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>).
- The household can “self-disclose” by bringing in a copy of their free/reduced approval notice or direct certification approval letter to the designated official operating the outside program. This option removes food service from these types of requests and is preferred. DPI recommends limiting the number of staff members responsible for collecting this data (e.g., one school secretary who has been trained on confidentiality, rather than each athletic coach).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** Direct Certification has not been run within the required time frames. DC was run on 8/24/18. It should have been run again on 11/24/18 and again on 1/24/19, at a minimum. DC has been run on 8/24/19, 9/8/18, and 10/18/18 so far.

Corrective Action Needed: Run the full enrollment for the district through Direct Certification. Upload the output match file to the student information software and send out any DC Notification of Benefits letters to households as applicable. **Submit a statement (via email) to the consultant this has been completed.**

- ❑ **Finding #2:** One student was receiving free meal benefits due to an error when determining the application. The application was approved based on a 10 digit case number for Badgercare. However, Badgercare is not an eligible program to qualify for Free meal benefits.

Corrective Action Needed: Notify the household, whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **Submit a copy of the letter sent to the household and a screenshot to show the status was changed in the student information software.**

- ❑ **Finding #3:** One student was receiving free meal benefits due to an error when determining the application. The application was considered incomplete since the household number was not included. The household also left the income sections blank. When an application is incomplete, the Determining Official must follow up with the family to clarify and document the correct information on the application in order to determine it. Document any changes on the application, initial and date it.

Corrective Action Needed: Follow up with the household to confirm household size and whether they are receiving any income at this time. Re-determine the application if necessary and follow normal approval/denial procedures. **Submit a statement (via email) to the consultant of what the outcome of this situation was.**

- ❑ **Finding #4:** Six students were noted on the Benefit Issuance list of being directly certified free without any documentation to support the free status. Each student was found as an N code on DC which means they are ineligible to receive free meals unless extended benefits from another household member.

Corrective Action Needed:

If there is documentation to support the free status, such as extension of benefits, **submit the name of the student(s) extending the benefit, the name of the student that is receiving the extension, and a screenshot from the student information software as documentation to show the students reside at the same address.**

If there is no documentation to support the free status, notify the household(s), whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar

days from the date the notification letter was sent out. **Submit a copy of each letter sent out and a screenshot for each student to show the eligibility status was changed in the student information software.**

- ❑ **Finding #5:** One student is receiving free meal benefits with no documentation on file to support this status. A sibling in the same household was found on Direct Certification with a Z code, meaning they qualify for Reduced-price meals.

Corrective Action Needed:

If there is **documentation** to support the free status, submit documentation to support the free status.

If there is **no documentation** to support the free status, all students in the household must be changed to reduced status. Notify the household, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **Submit a copy of the letter sent out and a screenshot for each student to show the eligibility status was changed in the student information software.**

Verification

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

- The SFA had to verify one application. As a result, the student was found on DC and there were no changes to the eligibility status.
- Verification was completed prior to the November 15 deadline.
- The Confirming Official only needs to sign off on the application(s) chosen for Verification.
- The Verifying Official must sign off on the application(s) chosen for Verification once the Verification process is complete.

Meal Counting and Claiming

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

- No errors were found on the monthly claims for reimbursement on the NSLP or SBP claims.
- 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).
- During breakfast at the Middle School/High School, the food service software is unable to break out the breakfast counts at the Middle School and the High School for the claim. The Food Service Director (FSD) has the Middle School students sign a piece of paper when they come through the line. After meal service, the FSD will manually charge each Middle School student that took breakfast. The food service software is fully capable of separating counts between each school even if they are located in the same building. Work with the software company to correct this issue.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of Athens School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. Everyone

was welcoming, friendly, and helpful. The Food Service Director and school nutrition professionals asked questions reflective of their desire to comply with regulations and to improve the child nutrition programs at Athens Lake School District. Through conversation, the Public Health Nutritionist shared resources, answered questions, and clarified program requirements, which the Food Service Director and school nutrition professionals were receptive to and appreciative of. Thank you also to the Superintendent, who talked openly about Smart Snacks guidelines and child nutrition program participation.

Technical Assistance and Program Requirement Reminders

National School Lunch Program (NSLP)

Four students at Athens High School selected non-reimbursable meals during lunch meal observation on Tuesday, January 15. Students left the point of service (POS) with insufficient fruits and/or vegetables to meet the 1/2 cup requirement, while others selected only two full components. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

School Breakfast Program (SBP)

Granola offered for breakfast credits as less than 1.0 ounce equivalent (oz eq) of grain per 0.5 ounce portion. Therefore, granola must be bundled with another grain item so at least 1.0 oz eq of grain is offered each day to meet the daily minimum requirement for grain, and so granola may be counted as an item as part of a reimbursable breakfast. An item at breakfast is defined as 1.0 oz eq grain, 1.0 oz eq meat/meat alternate, ½ cup of fruit and/or vegetable, or 1 cup of milk. Under OVS at breakfast, four food items must be offered, and students must select at least three food items, one of which is ½ cup fruit and/or vegetable to have a reimbursable meal.

Breakfast participation at Athens School District is low compared to the number of students enrolled in the district. Consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break district wide to help increase student participation. Breakfast in the Classroom works well in elementary schools and mid-morning models work well in middle or high schools where they have a passing time to grab a meal between classes. This could be set up in the cafeteria or on mobile carts in the hallways.

Whole Grain-Rich Requirement

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. The following grain products are not WGR: Otis Spunkmeyer lemon poppy seed muffin, Coco Roos cereal, Berry Colossal Crunch cereal, Pillsbury cinnamon twists, and parboiled rice. USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

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

Production Records

Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Use volume measures (such as cups) to

record portion sizes of fruits, vegetables, and milk, and use weight measures (such as ounces or grams) to record portion sizes of meat/meat alternates and grains.

While there is no required production record template, there are some examples that may be used on the [Production Records webpage](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). A PDF and a Microsoft Excel file will be emailed to the Food Service Director for consideration.

USDA Food Buying Guide for Child Nutrition Programs

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

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

Reference the School Nutrition Team (SNT) [Half-Cup Crediting of Fruits and Vegetables Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) for amounts required to credit as 1/2 cup as well as suggested serving sizes (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf).

Signage

Adequate signage helps students to select reimbursable meals. Signage was posted in the hallway outside of the serving line; it may be beneficial to reposition this inside of the serving line. All available food items at breakfast and components at lunch were listed during meal service observations.

Consider adding signage to the meal service line, like the SNT [Salad Bar Signage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx), showing students how many pieces of fruits and/or vegetables to select based on the planned portion size(s) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).

Crediting Documentation

Processed foods that are not listed in the FBG must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. Secure a PFS directly from the manufacturer or save a CN label directly off the packaging.

State-Processed and USDA Foods Product Information Sheets

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

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

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

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

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

Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

Watermarked Child Nutrition (CN) Labels

A CN label with a watermark is used when the CN logo and contribution statement are used on product information other than the actual product carton and is presented as a separate document. Manufacturers may provide schools with a CN label with a watermark during the bidding process or on their websites. Original CN labels on product cartons will not have a watermark. Product information on the CN label with a watermark can be changed. CN labels must be verified and collected from boxes as products are delivered. Once labels have been collected, check when new shipments arrive to determine if crediting towards the meal pattern has changed.

Portion Control

Using tools correctly is an important aspect of portion control. The correct way to portion food is to use a level scoop, which means the item is served as planned. Heaping scoops provide excess calories and nutrients and increase food cost, as more food is required to serve the same number of students. Food shortages may result. Conversely, scant scoops provide component shortages per portion and inadequate calories and nutrients. Excessive leftovers or food waste may result.

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

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

Child and Adult Care Food Program

Meal Pattern

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were

also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

Allowable Milk Types

Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk may not be served. Children one year old should be served unflavored whole milk. **Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk.** The Smarter Lunchrooms Movement has strategies to [encourage the consumption of unflavored milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Offer Versus Serve (OVS)

OVS is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service.

More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). For questions, please contact our specialists: Tanya Kirtz at Tanya.Kirtz@dpi.wi.gov or Erin Opgenorth at Erin.Opgenorth@dpi.wi.gov.

Findings and Corrective Action Required: Meal Pattern and Nutritional Quality

- ❑ **Finding #1:** Four students at Athens High School selected non-reimbursable meals during lunch meal observation on Tuesday, January 15. Students left the point of service (POS) with insufficient fruits and/or vegetables to meet the 1/2 cup requirement, while others selected only two full components. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

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

- ❑ **Finding #2:** The daily minimum requirement for m/ma was not met for lunch during the review period. The following represent the portion sizes planned, offered, and served during the review period:
 - Wednesday: Chicken fajita (cannot determine without weight of planned portion size)

The daily minimum requirement for age/grade group 9-12 is 2 oz eq. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Describe **specifically** how the daily minimum requirement for m/ma will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address chicken fajita in your reply.

- ❑ **Finding #3:** The daily minimum requirement for grain was not met for lunch during the review period. The following represent the portion sizes planned, offered, and served during the review period:

- Wednesday: Tortilla chips 1 ounce (1.25 oz eq)

The daily minimum requirement for age/grade group 9-12 is 2 oz eq. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Describe **specifically** how the daily minimum requirement for grain will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address tortilla chips in your reply.

- ❑ **Finding #4:** Weekly vegetable subgroup requirement was not met for starchy during the review period due to 3/8 cup of green peas (1/4 cup) and jicama (1/8 cup) planned, offered, and served. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Describe **specifically** how the weekly vegetable subgroup requirement for starchy will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address green peas and jicama in your reply.

- ❑ **Finding #5:** Daily and weekly minimum requirements for grain were not met for breakfast during the review period as a result of 0.5 ounces of granola offered on Monday, December 10, which did not meet the definition of an item at breakfast (e.g. 1.0 oz eq grain, 1.0 oz eq meat/meat alternate, ½ cup of fruit and/or vegetable, or 1 cup of milk). The daily and weekly minimum requirements for grain for the K-12 breakfast meal pattern are 1 oz eq and 9 oz eq, respectively.

Required Corrective Action: Describe **specifically** how the daily and weekly minimum requirements for grain will be met for breakfast during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address granola in your reply.

- ❑ **Finding #6:** Otis Spunkmeyer lemon poppy seed muffin, Coco Roos cereal, Berry Colossal Crunch cereal, Pillsbury cinnamon twists, and parboiled rice are not whole grain-rich products.

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

- ❑ **Finding #7:** Production records submitted for breakfast and for lunch the review period were not filled in completely nor consistently. All required information on the template must be documented for all menu items, including planned portion sizes for fruits and vegetables offered on the garden bar.

Required Corrective Action: Submit three days of completed production records for breakfast and for lunch. Select production records you are confident are filled in accurately and completely.

3. RESOURCE MANAGEMENT

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 [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>).

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

Allowable Costs

- Bad debt from unpaid student lunch accounts is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a 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>).

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 the paid student milk under the WSDMP), and a Food Service operated Vending Machine at the Middle School/High School.
- 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.
- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum, to ensure all costs of Nonprogram foods are being covered. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

Adult Meals

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

Resources

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

Indirect Costs

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

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.

- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume.
 - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district’s total.

Findings and Corrective Action Needed: Resource Management

- ❑ **Finding #1:** The Unpaid Meal Charge Policy is not clearly communicated with households and is not being enforced. As a result, there are many students that have large negative account balances and are still allowed to charge a meal to their account.

Corrective Action Needed: Submit a plan of action of how you will communicate the policy with households, how often you plan to remind households of the policy, and how you plan to enforce the policy.

- ❑ **Finding #2:** Fund 50 is not being properly reimbursed for catering events. For a catering event in December 2018, Fund 60 was charged for all of the items purchased for the event instead of being charged what was on the catering invoice from the Food Service Department. The amount Fund 60 paid did not cover all costs shown on the catering invoice.

Corrective Action Needed: Reimburse Fund 50 for the difference (\$21.27) of the catering invoice (\$467.23) minus what Fund 60 paid (\$445.96). **Submit a copy of a different catering invoice from January 2019 and a copy of the General Ledger for Fund 50 to show the amount reimbursed to Fund 50 as revenue.**

- ❑ **Finding #3:** The cost of the nonprogram foods is not being covered by the revenue of nonprogram foods.

Corrective Action Needed: Use the DPI Nonprogram Food Price Calculator tool to price out all nonprogram foods. **Submit a copy of the completed tool and the date you plan to implement the new prices.**

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

- The And Justice For All poster was posted in a publicly visible location at the review site.

Special Dietary Needs

- If accommodating students with allergies by having a specific table to sit at, it is advised to not label it “peanut free” or “allergen free”. Instead, label it “allergen aware” or “peanut aware” as you may not be able to guarantee the table(s) are free from any allergens at all times of the day. The school(s) should have special procedures for special dietary needs.

Findings and Corrective Action Needed: Civil Rights

- **Finding #1:** The lunch and breakfast menus do not have the correct shortened USDA non-discrimination statement on them.

Corrective Action Needed: Update the menus to have the full USDA non-discrimination statement.
Updated on-site. No further action required.

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.
- The on-site monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](#) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

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.

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](#) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

Findings and Corrective Action Needed: Local Wellness Policy

Finding #1: The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf). **Provide a statement of when you plan to have the policy updated and compliant with the final rule.** The [Wellness Policy Builder](https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy (https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1).

Smart Snacks in Schools

Commendations/Comments/Technical Assistance (TA)/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 unless the sales qualify for an exemption. More information is available on the [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

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.

The vending machine in the cafeteria is stocked by food service with foods and beverages intended to comply with Smart Snacks standards. Onsite observation, without access to complete nutrition facts labels with ingredient statements or Smart Snacks Calculator printouts, revealed several food items to be non-compliant (e.g. BeneFIT Bars [nutrient standard], Pop-Tarts [nutrient standard], Super Slice [nutrient standard], Udi's Gluten Free Snicker Doodle cookies [general standard], Chex Mix Muddy Buddies [general standard], etc.).

DPI SNT recommends using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/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.

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. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Findings and Corrective Action Required: Smart Snacks

- Finding #:** Smart Snacks compliance documentation for foods and beverages sold in the vending machine was not submitted offsite nor onsite; therefore, it is unclear if these items meet Smart Snacks general and nutrient standards.

Required Corrective Action: Indicate in a written response intentions regarding evaluating foods and beverages for sale in the vending machine; keeping necessary documentation; using inventories of non-compliant products; purchasing compliant replacement products; and training. 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.

Buy American

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

The following information must be recorded on a Buy American Non-Compliant Product List of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. **Cost analysis** – SFA determined the cost of the domestic product, when compared to the non-domestic product, was above the predetermined allowable cost difference established by the SFA.
 - b. **Seasonality**- Product(s) is/are not available domestically during certain times of the year. (*SFA is required to record or list the months that the domestic product is not available.*)
 - c. **Availability** – Product(s) is/are not available to purchase domestically.
 - d. **Substitution** - In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (*The SFA is required to record the reason the distributor substituted the product.*)
 - e. **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - f. **Other** - Please provide a written explanation.

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) 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/school-nutrition/procurement/buy-american>). For more information on Buy American exceptions, visit the [Buy American Provision Memos](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos>).

For domestic products without country of origin labeling (COOL), consider the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the [Buy American Provision webpage](#) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

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

Required Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. **Provide a copy of the form(s) that will be used and include any noncompliant products.**

Professional Standards

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

Professional Standards: New Food Service Director Hiring Requirements

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

Professional Standards: Training Requirements

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

Annual Training Requirements for All Staff

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

Findings and Corrective Action Needed:

- Finding #1:** Trainings are occurring but not being tracked on a spreadsheet.

Corrective Action Needed: Use the [DPI tracking tool](#) to track trainings (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>). **Submit a copy of a completed tracking tool.**

Food Safety and Storage

Commendations

- The Food Safety Manual was available for review and had all required information. The temperature logs, calibration logs, and sanitizing solution logs were documented well and organized nicely.

Technical Assistance

- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- Any food that is a TCS food must be kept under refrigeration or hot held (depending on the food). If not, it must be discarded after meal service.

Time/Temperature Control for Safety (TCS) Food

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

Time as Public Health Control

- When using “Time as a Public Health Control”:
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- Finding #1:** The most recent food safety inspection was not posted in a public location.

Corrective Action Needed: Post the most recent food safety inspection in a public location. **Corrected on-site. No further action required.**

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.
- Be sure to keep all documents pertaining to the School Nutrition Programs for 3 years plus the current school year. You may shred anything from the 14-15 SY and prior.

School Breakfast Program (SBP)

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

- The SFA notifies households of the breakfast program at the beginning of the school year.
- The SFA posts the monthly menu in the schools.
- The SFA must notify families of the availability of breakfast multiple times throughout the school year.

Summer Food Service Program (SFSP) Outreach

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

- The SFA operates the Summer Food Service Program each summer.

5. OTHER FEDERAL PROGRAM REVIEWS

Wisconsin School Day Milk Program

Commendations/Comments/Technical Assistance/Compliance Reminders

- The 17-18 SY claim was validated. As a result, the SFA was under claiming the number of milk cartons served to grades PreK-3. The Reduced eligible milk was not being claimed. This was communicated with the Accountant for the School Nutrition Team immediately, allowing the SFA to receive the reimbursement they were eligible to receive.
- Students in grades PreK-5 grade are eligible to participate in the Wisconsin School Day Milk Program (WSDMP).
- Free and Reduced eligible students are not charged for a milk and the paid eligible students must pay \$0.35 for a milk.
- Within the WSDMP, the SFA is able to claim the total number of Free and Reduced milk served to students in grades PreK-5. The SFA has the authority to decide what grades participate in the WSDMP.
- Since you are not receiving reimbursement for the milk served to paid students, this revenue should be recorded as a Nonprogram Foods Revenue on the Annual Financial Report.

Findings and Corrective Action: WI School Day Milk Program

- ❑ **Finding #1:** The WSDMP contract is out of date.

Corrective Action Needed: Submit a new contract for the WSDMP for approval.

“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>).

