

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

School Food Authority: Montello School District
School(s) Reviewed: Forest Lane Elementary School

Agency Code: 393689
Review Date(s): 3/5/19–3/6/19
Date of Exit Conference: 3/6/19

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Montello School District for the courtesies extended during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to

respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The staff members did an excellent job preparing for the review, and were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the nutrition programs. The food service staff were welcoming, knowledgeable, and clearly dedicated to their work. The cafeteria was inviting and interactions between staff and students during meal times were positive and customer-service focused.

The food service director is fairly new to the role and is doing an excellent job. The director clearly values learning about the programs, works hard to implement the regulations, and looks for fun ways to promote the programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Technical Assistance:

- Of the 211 eligibility determinations reviewed, four errors were identified. These errors have been recorded on the SFA-1 form and are used to determine an error percentage. The error percentage was 1.9%, which is low enough to not require an independent review of applications or benefit issuance fiscal action.

Food Service Webpage

- It is recommended to remove the generic FAQ parent letter from the food service webpage to minimize confusion and duplication, as the district-specific FAQ parent letter is posted as well. The instructions for completing the application should be added to supplement the FAQ parent letter and the application as it could greatly assist households in application completion. Additionally, it is suggested the Spanish versions of application materials be added to the webpage since they are available in the printed registration packets and could be of benefit to families that prefer or require Spanish translations.

Effective Dates

- Eligibility effective dates are the date an application is approved, the date of the DC run the student matches on, the date a benefit extension is identified, or the date the determining official is notified by the appropriate school official (e.g. homeless liaison or migrant coordinator) that a student is homeless, migrant, runaway, or enrolled in Head Start. Backdating of eligibility is not allowable.

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](#) 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](#) form is located on

the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Transferring Students

- Transferring the eligibility determination between Local Educational Agencies (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. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.
- Wisconsin DPI requires source documentation of the student's previous eligibility. Source documentation means that the information originally used to determine the student's meal eligibility is shared with the school requesting the information for the new or transfer student. Source documentation may include a copy of the original application or a copy of a direct certification run with the student's name listed. A phone call or copy of a benefit approval letter are examples of documentation that would not be sufficient to establish the new or transfer student's eligibility.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding A:** There were four student eligibility determinations from the benefit issuance sample that did not have adequate documentation on file to support the benefits. These students names did not match to direct certification, there was no approved application on file, they were not determined as categorically eligible by the appropriate official, and were not extended a benefit correctly from another household member. These four students were given their benefits based on an eligibility report generated by the software system that lists "additional students" at the end of the report. It was unclear how this report determined the students were eligible for benefits, as adequate documentation could not be otherwise obtained while on-site.

Corrective Action: Contact the software vendor regarding this report and the parameters used to compile the "additional students" section. Work with the software vendor to resolve any issues with this report and its parameters. Investigate further if there is any valid eligibility information on file for these students to support their benefits. If documentation is obtained to support the benefits, submit this documentation to the consultant. If documentation cannot be obtained to support the benefits, the households must be sent an adverse action letter advising that their status will change to paid in 10 calendar days. If adverse action letters are sent, the students' eligibility must be updated in the student information system after the 10 day period. Send copies of the adverse action letters to the consultant, if adverse action is needed.

- ❑ **Finding B:** Discussions with school staff and review of the online student/parent handbook revealed that households were offered fee waivers upon completion of the USDA application for meal benefits. Under USDA regulations, the meals application may only be used for determining free and reduced priced benefits for children participating in the school nutrition programs. Using application completion as a means for households to obtain a fee waiver is considered using the application for a non-program purpose. Completing an application for free or reduced priced meals is completely at the discretion of the household and schools may not require or offer financial incentives for families to complete the application. Please reference page 83 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) for additional information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Corrective Action Needed: Please submit a detailed statement indicating the steps the district intends to take to immediately discontinue the practice of providing fee discounts in exchange for completed meal applications.

❑ **Finding C:** The application approval/denial letter and the direct certification (DC) notification letter require some updates. Both letters contain an improperly formatted non-discrimination statement. The statement must not be modified in any way, including spacing of the sections, and must be in the same size font as the majority of the document. Additionally, the DC letter is lacking some information:

- The letter references an “Application for Educational Benefits,” but should likely reference the meal program instead.
- The letter refers only to free meals throughout, but students may also be eligible for reduced price benefits via DC.
- Only Food Share and W-2 cash benefits are mentioned in the letter as programs that may result in a DC match. Medicaid, FDPIR, and foster child status should be listed as well.

Corrective Action: Update both letter templates to include the information described above. It is highly recommended to reference the equivalent [DPI template letters](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#notification-letters) when updating the letters in the software system (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#notification-letters>). It may be useful to copy and paste parts of the DPI letters into the letter templates in the software system. Send the updated letter templates to the consultant.

Verification

Technical Assistance:

Official Roles

- There was confusion over the roles of the confirming and verifying officials in the process. The determining official is responsible for processing submitted applications and determining the benefit the household is eligible for. Before verification activities can begin, a designated confirming official must review each approved application selected for verification to confirm that the initial benefit determination was accurate. The confirming official does not need to double check all applications processed by the determining official—just those selected for verification. After the confirming official confirms the initial determination on the selected applications, then the verifying official may begin the verification process by contacting the household to request supporting documentation. If the confirming official disagrees with the initial determination, then specific procedures must be followed to proceed with verification. All officials must sign and date the application when their duties in the process are complete. Please reference pages 103-104 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) for additional information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Verification Collection Report (VCR)

- The VCR contained errors. The report indicated that the application verified was directly verified. However, this application was not actually directly verified. The verification results should have been reported in section 5-8 box B number 4. For details about the definition of direct verification, please reference pages 109-112 of the Eligibility Manual.

Findings and Corrective Action Needed: Verification

- ❑ **Finding D:** The officials designated on the contract are incorrect when compared to the actual roles of each person. The VCR contained errors regarding verification results (see above).

Corrective Action: Update the officials' name on the contract to reflect actual roles in the meal benefit and verification process. Submit a statement describing how the VCR will be completed accurately in upcoming school years.

Meal Counting and Claiming

Technical Assistance:

Visiting Students

- Please note that SFAs may claim visiting students outside of the district in the paid category or the individual's benefit category with documentation, unless they are from a CEP school. In order to ensure the full meal cost is covered when serving visiting students, it is recommended to either charge the student the paid student price and claim in the paid category, or charge the adult meal price and not claim the meal. Simply charging the paid student price but not claiming for reimbursement will likely not cover the entire cost of the meal.

Point of Service for Field Trips

- Counts used for reimbursement claims must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal. Because field trip meals are claimed for reimbursement, there must be an appropriate POS process in place for serving, counting, and claiming these meals. Counting meals and charging students that ordered meals when the meals leave the kitchen for the field trip is not an acceptable POS. In this method, there is room for error if students order but do not take their meal, end up not going on the trip, get sick or leave prior to the meal, or other such discrepancies.

Enrollment on Claims

- The enrollment number reported for each school on the claims should reflect the number of students enrolled at the site that have access to the respective meal. It appears that the enrollment number on the software-generated edit check is different than the detailed attendance report enrollment number generated in a different part of the software system. The claim preparer should work with the appropriate school staff members and software vendor to investigate why enrollment numbers vary by report, and should ensure the correct enrollment numbers are entered on the claim as to reflect the number of enrolled students at each school with access to the meals.

Findings and Corrective Action Needed: Counting and Claiming

- Finding E:** The current POS system for field trip meals does not meet POS requirements. Currently, student accounts are charged for field trip meals when the meals are taken for the field trip according to which students ordered a meal. This is not acceptable because the students are counted and charged before they take their meal at the point where it can be confirmed that an eligible student received their reimbursable meal.

Corrective Action: Please modify the field trip POS system so that students are checked off by the accompanying teacher as they take their meal. Completed check off sheets should be returned to food service and used for charging student accounts and claim submission. The [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) can be of assistance in the modification of field trip POS (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). Please submit a written plan detailing how field trip meals will be counted and claimed going forward, including a copy of the check off sheet that will be used at the POS.

- ❑ **Finding F:** Operating days were not correctly reported on the January breakfast claim for Forest Lane Elementary. One day in January was a delayed start due to weather, so elementary students were not offered breakfast on this day. However, this delayed start day was counted as an operating day for breakfast at the school.

Corrective Action: Submit a statement of understanding that operating days reported on the claims must reflect the actual number of serving days for each meal at each school.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Montello School District runs a very organized meal program. Thank you to the food service director for the dedication to planning balanced meals with colorful vegetable choices. Signage in the cafeteria and service line was neat and appropriate. Staff was friendly and knowledgeable. It was a pleasure to visit and review Forest Lane Elementary. Keep up the good work! Please reach out to the School Nutrition Team (SNT) with any future questions.

Technical Assistance:

Grapes

- Grapes are listed on the menu during the week of review. Per the [Food Buying Guide](https://foodbuyingguide.fns.usda.gov/), ½ cup of grapes is equal to about 14 large grapes (<https://foodbuyingguide.fns.usda.gov/>). A serving of grapes should be counted out and used as a visual reference during service. Consider using a larger tool (e.g. a spoodle that holds 14 grapes) to portion ½ cup creditable amount of grapes.

Salad Bar Signage

- Thank you for hanging signage above the salad bar and encouraging students to take appropriate amounts of vegetables. The SNT also has a [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) with pictures that can be posted on a salad or garden bar (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

Turkey Bacon Crediting Documentation

- The Godshall's Fully Cooked Turkey Bacon 2280-801-000 in the Turkey Club does not have sufficient documentation to credit as a meat/meat alternate. However, the turkey (2.29 oz = 1.5 oz eq m/ma) and cheese (one ½ oz slice = ½ oz eq m/ma) in the Turkey Club recipe provide 2 oz eq m/ma, which meet the minimum daily requirement for all grade groups.

Beef Hotdog Crediting Documentation

- The Product Formulation Statement (PFS) for Kent Quality Foods Beef Franks #417350 lists the description of creditable ingredients per the Food Buying Guide (FBG) as "beef franks." This does not match an entry in the FBG. However, this product can be crediting using the "frankfurter, bologna" entry in the FBG. It does not require a PFS to credit.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Non-reimbursable meals subject to fiscal action

At lunch on 3/5/19, **two** students selected meals that did not contain three or more complete components. **Nine** students selected meals that did not contain ½ cup of fruit and/or vegetables. At breakfast on 3/6/19, **one** student selected a meal that did not contain three or more items.

- ❑ **Finding G:** There were several non-reimbursable meals served during observation related to OVS. At lunch on 3/5/19, two students selected meals that did not contain three or more complete components. Nine students selected meals that did not contain ½ cup of fruit and/or vegetables.

The non-reimbursable meals at lunch on 3/5/19 seem to be systemically related to misunderstanding Offer vs. Serve (OVS). The school must OFFER the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal. Students must SELECT at least three full, different, food components, one of which is ½ cup fruit and/or vegetable.

Corrective Action: Have staff responsible for determining reimbursable meals attend a training on OVS. The [lunch meal pattern](#) and [OVS webcasts](#) 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 H:** 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 is out of date and missing information, such as
 - Planned serving size for each grade group and adults
 - Number of reimbursable and 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. **The state agency highly recommends utilizing these production record templates.** A copy of the production record requirements “[Must Haves and Nice to Haves](#)” list can be found at that link (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Corrective Action: Send one week of completed lunch and breakfast production records, including the planned serving size and the number of meals planned/served daily. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.

- ❑ **Finding I:** During the week of review ¼ cup of diced ham was offered. M/MA is credited by weight, not volume.

	Measures	Measured In	Conversions	Tools Used
WEIGHT (how heavy is it?)	Meat/meat alternates Grains	Ounces (oz) Grams (g) Kilograms (kg) Pounds (lb or #)	1 lb = 16 oz 1 oz = 28 g	Scale
VOLUME (how much space does it take up?)	Fruits Vegetables Milk	Fluid ounces (fl oz) 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

***WEIGHT AND VOLUME ARE NOT EQUAL OR INTERCHANGEABLE... OUNCES ≠ FLUID OUNCES**

Corrective Action: Please provide the weight for ¼ cup diced ham offered at lunch on 1/9. The public health nutritionist will then be able to credit the diced ham using provided documentation.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes 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.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance:

Unpaid Meal Charges

- The SFA currently does not have an unpaid meal charge policy in place, however it is in the process of being developed and approved. As the food service director continues working on the policy, it may be beneficial to review [USDA's Overcoming the Unpaid Meal Challenge](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-29-2017a2.pdf) resource (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-29-2017a2.pdf). This resource contains guidance on regulations, best practices, and suggestions from other SFAs.
- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf)
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ✓ **Finding J:** The total revenues and ending fund balance reported on the Annual Financial Report (AFR) do not match the totals reported on the school finance PI-1505 report. This discrepancy between the AFR and PI-1505 must be investigated, as the Fund 50 totals should match between reports. Additionally, the revenues were all reported in the column for "operating transfer from non-food service account" instead of "school food revenue excluding transfers" where they should have been allocated.

Corrective Action: The AFR errors were discussed with the bookkeeper on-site and the report discrepancy was investigated. The difference between the AFR and the PI-1505 was related to a transfer into Fund 50 for PLE in 2017-18 in lieu of raising paid lunch prices, which may have occurred after the AFR was submitted. Documentation showing the transfer was provided by the bookkeeper. The consultant has the information necessary to correct the 17-18 AFR. *No further action required.*

- ❑ **Finding K:** The school has no written unpaid meal charge policy which was required to be in place and distributed to families by July 1, 2017.

Corrective Action: Develop a timeline for a written unpaid meal charge policy and plan for distribution of the policy to households. Provide this information to the consultant in writing—please be detailed and specific.

Revenue from Non-Program Foods

Technical Assistance:

Non-Program Food Revenue Tool

- The food service director completed the DPI non-program foods revenue tool in May 2018 to aid in pricing adjustments for the next school year, and plans to continue to complete the tool each spring.
 - Review of the completed tool suggested that the outcomes indicating compliance with non-program food revenue requirements were accurate, despite several minor errors in tool completion.
 - Please keep the following points in mind when completing the tool in the future:
 - Adult meals should be included in the top non-program foods section of the tool.
 - The raw food cost for adult meals should be the same as the student meal counterpart since they are served the same meal.
 - Sales information from the food service-run vending machine should be included in the top non-program food section.
 - The correct selling prices for reduced price meals must be listed in the bottom program foods section.
 - The weighted average price for paid meals should be entered into the bottom program foods section—not just the highest paid student price.
 - Adult meals prices are established based on the calculated cost to produce a meal and using the adult meal pricing worksheet. The items in the vending machine are the same items sold a la carte in the service line, so the prices (though not the sales volume) for vending machine items was captured in the tool. Adding in the missing or inaccurate pricing information for program foods did not affect the results of the tool. No corrective action required.
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4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or the state agency within five days. This should be included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](https://fns-prod.azureedge.net/sites/default/files/113-1.pdf) resource (https://fns-prod.azureedge.net/sites/default/files/113-1.pdf).

Special Dietary Needs

- While the SFA is not currently accommodating any special dietary needs, it is important to note and become familiar with the pertinent regulations for possible accommodations in the future.
- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>).
- If accommodations will be made in the future based on signed medical statements, the food service director should receive and retain copies of the signed statements submitted by the household. It is crucial that the food service director be able to easily access the exact accommodation request so that it can be implemented correctly and safely according to the medical practitioner's directions.
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice or water may not be substituted for fluid milk unless juice or water is specified as a substitution on a medical statement signed by a licensed medical practitioner. An SFA may choose to offer lactose-free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA without a medical statement. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Findings and Corrective Action Needed: Civil Rights

- ✓ **Finding L:** The *And Justice for All* poster was not posted in a location visible to program participants—it was posted in the kitchen only at Forest Lane Elementary.

Correction Action: Display the poster in a location publicly visible to program participants. *Corrected on-site; no further action required.*

- ❑ **Finding M:** The public release was sent to a media outlet, but it was not sent to any grassroots organizations for SY 2018-19. See technical assistance above.

Corrective Action: Submit a statement describing where and when the public release will be distributed to all required outlets for the upcoming school year. Please list specific grassroots organizations it will be sent to.

On-site Monitoring

Technical Assistance:

- While the SFA operates four school sites according to the online contract, all school sites are located in the same building. There are two kitchens in the school building which are inspected together for food safety inspections. The food service director has direct daily oversight over both kitchens and spends the work day divided between the two kitchens. Due to this set-up, on-site monitoring is not required. The director may choose to complete the on-site monitoring forms as desired if it will help maintain program oversight.
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Local Wellness Policy (LWP)

Commendations:

- The SFA's wellness policy contains all of the required content. The SFA does a good job retaining documentation pertaining to the wellness policy and committee. The wellness committee meets several times per year and consists of a good variety of stakeholders. It is clear that the district values student, staff, and family wellness and takes care to meet wellness policy requirements. Great job!

Technical Assistance:

Triennial Assessment

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place.
- To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources).
- Additionally, the SFA is required to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Resources:

- 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>). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.
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Smart Snacks in Schools

Commendations:

- There is thorough and sufficient documentation for Smart Snack sales--thank you! Non-program food sales are compliant or meet exemption qualifications. No findings.

Technical Assistance:

Entrees

- An entrée sold a la carte is exempt from all of the general and nutrient standards the day of and the day after it is served as part of a reimbursable meal (e.g. Benefit Bar, UBR, or PBJ Wafer sold a la carte or in vending machines at the high school).
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Professional Standards

Technical Assistance:

- The food service director was hired after 7/1/15 and did not meet the minimum hiring standards that applied for the district's size. A hiring exemption was approved by DPI in August 2018 that established a training plan for the new director.
- The new director is excelling in the position and is running the programs with careful attention to detail and passion for the students. The director is on track with the training plan and seeks out opportunities to learn with enthusiasm.

Findings and Corrective Action Needed: Professional Standards

- ❑ **Finding N:** The tracking tool used for recording professional standards hours does not contain all of the required information. The following information should be added to the tracking tool:
 - Date of hire for each employee
 - Title/position
 - Number of hours worked per week/full vs part time designation
 - Professional standards employee category (i.e. director, manager, staff)

Corrective Action: Submit an updated training tracker that contains the additional information requested above. The [DPI training tracker](#) can be used going forward, if desired

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>).

Food Safety

Technical Assistance:

Food Safety Inspections

- The middle/high school kitchen and the elementary school kitchen are all located in the same building, but are two distinct kitchens. The local regulatory authority inspects both kitchens at the same time and issues one report that covers both kitchens. During the on-site review, the most recent food safety inspection report was posted in the middle/high school cafeteria. The report was not posted in the elementary school cafeteria. Inspection requirements were met since the report was publicly available in the building, however it was recommended to post a copy of the report in

the elementary cafeteria as well. The food service director took this suggestion and posted the report in the elementary while on-site. Thank you!

Food Storage

- In the cooler, full crates of half pints of milk were stored on the floor. It is advisable to store full milk crates on top of empty crates to get them off of the floor at least six inches. Wisconsin Food Code requires that food be stored at least six inches off of the floor. It is strongly recommended to consult the local sanitarian regarding the acceptability of storing full milk crates on the floor if this practice will continue.

Food Safety Plans

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria including on field trips.
- It is encouraged that the food service director continue modifying and updating the SOPs in the food safety plan as processes change and as the SOPs can be made more specific to actual practices occurring in the operation.
- The SFA did not have a complete list of HACCP process 1, 2, and 3 menu items in the elementary section of the food safety plan. A complete list was included in the middle/high school section. It is highly recommended to include a complete HACCP process categorization by menu item list in the elementary plan as well.

Findings and Corrective Action Needed: Food Safety

- ❑ **Finding O:** The food safety plan for Forest Lane Elementary did not contain SOPs for the [Afterschool Snack Program](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/afterschool-snack-sop.doc), [field trip meals](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx), or [milk barrels](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-barrel-temperature.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/afterschool-snack-sop.doc>; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-barrel-temperature.docx>). The insulated ice-lined rolling coolers used to serve milk are similar to milk barrels, and thus the milk barrel SOP template could be adapted for the coolers. It is recommended to adopt the SOP for milk barrels with monitoring temperature option to allow for unserved milk in the coolers at the end of service to be save for future use. It is also encouraged to pursue using actual milk barrels or a plug-in milk cooler to serve milk during meal periods, as these are both very effective means to maintain temperature control.

Corrective Action: Develop SOPs for the three items above. There are templates available on the DPI Food Safety webpage that can assist in development of site-specific SOPs. Submit the final SOPs to the consult. Please be sure the SOPs are specific to the practices at the site.

Buy American

Findings and Corrective Action Needed: Buy American

❑ **Finding P:** The following non-domestic items were found in storage without supporting documentation:

- Red peppers- Mexico
- Cucumbers- Mexico
- Bananas- Honduras
- Asparagus- China
- Green olives- Spain
- Black olives- Spain
- Pineapple- Indonesia
- Mandarin oranges- China
- Garlic powder- China

Corrective Action: 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>).

Wisconsin School Day Milk Program (WSDMP)

Technical Assistance:

- The SFA's online contract indicated participation in the WSDMP for 2018-19. Additionally, the 2017-18 contract also indicated WSDMP participation. However, this program was not operated in either school year. The last school year the program was run was 2016-17. For this reason, the SFA submitted a blank WSDMP claim for 17-18 since the program was not operating but the contract indicated participation. Contracts must accurately reflect program participation.

Findings and Corrective Action Needed: WSDMP

✓ **Finding Q:** The 2018-19 online contract indicated participation in WSDMP when the program was not actually operated in the 18-19 school year.

Corrective Action: Update the online contract to reflect "not in program" for WSDMP. *Corrected on-site; no further action required.*

Afterschool Snack Program (ASP)

Technical Assistance:

Production Records

- Each afterschool snack location is required to maintain documentation supporting that reimbursable meals were provided to students, including production records with snack items and serving size. Menus are not required, but encouraged. A [production record template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/asp-production-record-template.xlsx) is available on the Afterschool Snack webpage, and an updated version will be emailed to the food service director (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/asp-production-record-template.xlsx>).
- The production records on file for the program were not completed fully. The serving sizes for each item were not noted, the leftovers were not counted and recorded correctly, and the total number

of students served a reimbursable snack each day was not recorded correctly. See corrective action below.

Reimbursable Snacks

- For snack to be reimbursable, the child must select two of the four components. Please reference the [snack meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nslp-meal-pattern-for-asp.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nslp-meal-pattern-for-asp.pdf>).
- During the on-site review, a PBJ and milk were served for snack. Students were allowed to choose both the PBJ and milk, or just one or the other. Four non-reimbursable snacks were served when students took just milk. Several other students took just the PBJ, which was acceptable on this particular day since the PBJ counted as a grain and meat/meat alternate serving. On days when one of the menued snack items does not count as two components, both items would need to be selected for the snack to be reimbursable (i.e. milk and apples, peanut butter and graham crackers, carrots and string cheese). This practice of allowing students to take just one of the items offered for snack and counting the snack for reimbursement is a systemic issue that has likely resulted in many non-reimbursable snacks claimed over the course of the school year. See corrective action below.

Snack Serving Sizes

- The planned snacks served in the program must meet the minimum serving sizes by age noted in the K-12 NSLP meal pattern (linked above). Discussion with the food service director indicated that fruit and vegetable servings for snack do not currently meet the $\frac{3}{4}$ cup serving requirement consistently. See corrective action below.

Waste

- The food service director expressed concern over waste in ASP that may result from requiring students to take two full components, as they might take something they really do not want. This is a valid concern, however it is important to remember that the two component requirement for a reimbursable snack is a core piece of the program and must be adhered to. If students will be allowed to take just one component; then the snack is not reimbursable, must be tracked separately, cannot be claimed for reimbursement, and must be paid for with non-federal funds.
- Here are some considerations to minimize waste:
 - Plan snack menus that feature popular items more frequently and feature less popular items that are commonly wasted less often.
 - Let students take home their uneaten items if the items can be safely transported (not recommended for TCS foods such as milk, cheese, etc.). Consider planning menu items that can be easily taken home with the students if they choose to do so.
 - Implement a no-thank or sharing bin/table following appropriate protocols (see below)

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

- Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.
- Considerations
 1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
 2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage. Note: OVS does not apply during afterschool snack.
 3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
 4. Parents will be informed in writing.
 5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
 6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
 7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
 8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).
- Wholesome leftovers 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.
- 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>).

Findings and Corrective Action Needed: ASP

- ❑ **Finding R:** Production records were not completed fully and correctly. Additionally, some of the menued snack items are not meeting the minimum required serving sizes. Please note the following:
 - The number of leftover items at the end of service should be counted and recorded at the end of service. Subtracting the number of students that took a snack from the number of servings prepared is not an acceptable way to determine leftovers. The actual amount of food items left unserved after service time must be counted and recorded.

- The number of students and adults served a full reimbursable snack should be recorded daily on the production record. Adult snacks cannot be claimed for reimbursement. The number of students served should be recorded based on the POS count taken by the supervisor.
- The planned serving sizes for each item must meet the minimum serving requirements in the snack meal pattern. The correct serving sizes should be reflected on the production records.

Corrective Action: Submit two weeks of completed, updated production records. Please be sure the production records reflect correct serving sizes for all items served, and that the documents are completed entirely. Provide training to afterschool coordinators to ensure production record expectations are understood.

- ❑ **Finding S:** Non-reimbursable snacks are counted and claimed on a regular basis because students are permitted to decline snack components and are still counted as receiving a snack in the POS. Students are not being required to take two components, and thus a systemic issue of claiming snacks only containing one component is occurring. Fiscal action will be assessed for non-reimbursable snacks served.

Corrective Action: Provide training to afterschool coordinator(s) and to students (as is fitting) to ensure that only full, reimbursable snacks are claimed for reimbursement going forward. Only students that select two components can be claimed for reimbursement. If students select only one component, the snack is not reimbursable and must not be claimed for reimbursement. If non-reimbursable snacks are selected by students, these must be tracked separately and a non-federal funding sources must be used to pay for these snacks. Implement new processes to ensure only reimbursable snacks containing two full components are claimed. Once the process is fully implemented, submit 30 operating days of “clean” snack counts from the POS. The clean counts will be used to assess fiscal action.

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).

