

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

School Food Authority: Wisconsin Lutheran High School

Agency Code: 407987

School(s) Reviewed: 8720 Wisconsin Lutheran High School

Review Date(s): 12/14/2018

Review Team: TCB Reviewer, DPI Reviewer

Date of Exit Conference: 12/14/2018

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Wisconsin Lutheran High School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The TCB and DPI review team appreciates the eagerness of the staff at Wisconsin Lutheran High School for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, local wellness, and overall responsiveness to recommendations made while on site. We were impressed at the overall cleanliness of the kitchen and the courteousness of staff toward students. We were also very impressed with the involvement of school administration in the oversight of the meal program – the level of interaction between administrators and students demonstrated an atmosphere of respect for students, and likewise students for adults. Kudos to the administrators for their involvement in the program!

The review team is confident that Wisconsin Lutheran High School will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

CERTIFICATION AND BENEFIT ISSUANCE

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

158 eligibility determinations were reviewed; no errors were identified.

Free and Reduced-Price Meal Applications

- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for, with the exception of the one error where the student approved for free should have been reduced.
 - When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- 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.
- When a household has income in addition to a loss from a business, that income must be included on

the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically. If done through software, please check that the income levels are updated each year after July 1.
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced-price guidelines and an explanation that households with incomes at or below the reduced-price income limit may be eligible for free or reduced-price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>).

Household Size Box

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

Incomplete Applications

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

Application Forms

- Thank you for using the DPI prototype letters with the current non-discrimination statement.
- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program

official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.

- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Effective Date of Eligibility

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

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced-price meals and free milk 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.

Limited English Proficiency (LEP)

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

Direct Certification

- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.
- As a reminder, you are required to run direct certification a minimum of three times a year: at or

near the beginning of the school year, three months after the initial run and six months after the initial run.

- The effective eligibility date for a DC eligible student is the date of the original output file.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year.
- Wisconsin Lutheran High School had a 0% certification error rate. Congratulations!

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>).

Note: aggregate data (just F/R numbers or percentages without a connection to individual names does not require prior parental sign-off before sharing and often times satisfies the request).

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding: *None.*

Corrective Action Needed: *None.*

VERIFICATION

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

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

Findings and Corrective Action Needed: Verification

- Finding:** *None; Verification process was complete, accurate, and on time.*
Corrective Action Needed: *None.*

MEAL COUNTING AND CLAIMING

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

- The meal counting and claim for the Review Month was conducted perfectly.
- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- Please note that SFAs may claim visiting students in the paid category or the individual’s category with documentation, unless they are from a CEP school.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

Findings and Corrective Action Needed: Meal Counting and Claiming

- Finding:** *None.*
Corrective Action Needed: *None.*

2. MEAL PATTERN AND NUTRITIONAL QUALITY / OFFER VS. SERVE / DIETARY SPECIFICATIONS & NUTRIENT ANALYSIS

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

- All menu meal pattern requirements were met for the week of review in the month of review (November). Great work!
- All documentation was made available (CN labels, standardized recipes, product formulation statements, etc); all documentation substantiated the contribution amounts without issue.
- The School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's food service fund. Courses cover many areas of the school nutrition programs including administrative responsibilities, menu planning, and recipe analysis. Information on the dates and locations of these trainings is posted on the SNT website at <https://dpi.wi.gov/school-nutrition/training>. It is encouraged that any staff involved in the operation of the school nutrition programs attend these courses whenever possible in order to stay informed of the most current regulations and common practices.
- Ongoing training is essential to staying informed of school meal requirements. We strongly recommend utilizing the SNT website for resources, including training webcasts that can be watched at your convenience. A list of all available training webcasts can be found on our [webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) webpage (<https://dpi.wi.gov/school-nutrition/training/webcasts>).
- If serving only one vegetable to K-8 the full component must equal a minimum $\frac{3}{4}$ cup. If serving two or more vegetables, it is permissible to offer different portions to total $\frac{3}{4}$ cup as long as students have the ability to take all and not have to choose just one or the other.
- K-8 fruit offering at lunch is $\frac{1}{2}$ cup minimum (while 1 cup minimum must be offered at breakfast); what must be taken as a minimum during either meal service is $\frac{1}{2}$ cup (of vegetable or fruit).
- Reviewer discussed the following information needed in order for the menu planner to properly credit food items to meet meal pattern and minimum quantity requirements : USDA Food Buying Guide (online and phone application), USDA Food Facts Sheets, CN Labels, Production Formulation statements, and analyzing/updating standardized recipes.
- While on site, it was observed that signage was needed on the breakfast line in the hallway. This was addressed on the same day as the on-site. However, because of the frequent movement, setup and breakdown of the hallway 'serving line' for breakfast, additional signage may be needed in the future and is accessible from: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>
- **Technical Assistance:** The Dietary Specifications Tool, while demonstrating a low-risk rating for both breakfast and lunch at Wisconsin Lutheran High School, draws attention to items which are – as a best practice – recommended against, but not technically unallowable. An item that should be reconsidered in keeping with the healthy meal standards established by the USDA meal programs would be:
 - The use of fryers to fry certain items, like French fries. It is recommended to bake fries in lieu of using a fryer.

However, it must be noted that a substantial amount of fresh fruits and vegetable choices are made available on multiple 'veggie bar' stations during lunch. This is an excellent practice, and we hope it continues.

- **Technical Assistance:** During breakfast, three meals went through the point of service missing fruit but were recovered by the cashier who followed and corrected the students' understanding; the students then chose the required fruit component. It is recommended the cashier (who is somewhat new to the role) be provided with additional training on [Offer vs. Serve](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning), available from the DPI website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding: *None*

Corrective Action Needed: *None*

3. RESOURCE MANAGEMENT

NONPROFIT SCHOOL FOOD SERVICE ACCOUNT

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

- No comprehensive review was required of the nonprofit school food service account.
- The agency's Child Nutrition Program report may be obtained online, and provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
 - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment

such as a cart, etc., should be reported under “Other”.

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

FSMC

- Because of the Nonprogram Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all placed into Purchased Services as was previously done for SFAs with FSMC contracts.
- SFAs must annually be provided information on food costs and revenues from Food Service Management Companies (FSMC). The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs 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](#) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

Finding: *None.*

Corrective Action Needed: *None.*

PAID LUNCH EQUITY (PLE)

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

- The sponsor reported a surplus of \$29,862 as of January 31, 2018 and was therefore exempt from completing the PLE tool. Please note: It is not yet known if a similar exemption will be available for the 2019/20 school year. Therefore, the following reminders are included:
 - The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
 - Refer to the following information for additional guidance when completing the tool:
 - [PLE ‘In a Nutshell’](#)
 - the most recent [memo](#) from DPI
 - the most recent [USDA guidance memo](#)
 - Step by step instructions for completing the PLE tool can be found on the DPI [financial website](#) under Paid Lunch Equity.

Findings and Corrective Action: Paid Lunch Equity

Finding: *None.*

Corrective Action Needed: *None*

REVENUE FROM NONPROGRAM FOODS

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

- Nonprogram foods include: Adult Meals, Extra sides, and smart snack items.
- The Sponsor did a great job completing the nonprogram revenue tool, which showed no additional revenue was needed to comply with the requirement. Great work!
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus, nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be

separated from Program foods.

Adult Meals

- **Great job pricing adult meals! The SFA's current adult lunch price for 2018-19 SY \$(4.25). This exceeds the minimum pricing guidelines.**
- Please continue 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 2018-19 SY should be used to determine adult prices for the 2019-20 SY.
- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) 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>).

Resources

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

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

Finding: *None*

Corrective Action Needed: *None*

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: Indirect Costs

Finding: *None*

Corrective Action Needed: *None*

4. GENERAL PROGRAM COMPLIANCE

CIVIL RIGHTS

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

- The correct Nondiscrimination statement was on all program materials.

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

And Justice for All Poster

- “And Justice for All” poster was posted in public view where the program is offered.

Civil Rights Training

- Civil rights training had been attended by all staff in the schools and documentation was available for review.
- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended

that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students **must meet the USDA meal pattern requirements** in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regard 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](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

Finding: *None*

Corrective Action needed: *None*

ON-SITE MONITORING

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

- This sponsor is exempt from self-monitoring requirements because it is a single site. However, monitoring is still recommended in order to ensure compliance with all program areas, and because the sponsor oversees the operations of the Food Service Management Company.

Food Service Management Company (FSMC)

The following duties may not be delegated to the FSMC:

- Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year. It is due February 1 annually and the documents are kept onsite.
- Signature Authority – a representative of the SFA must sign off on the contracts for the SFA
- Edit Checks – an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software.

Findings and Corrective Action Needed: Onsite Monitoring

Finding: *None*

Corrective Action needed: *None*

LOCAL WELLNESS POLICY

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

- The sponsor’s wellness plan and activities were very well documented. Thank you for keeping detailed records and making them available for the review – nice job!

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](#). This can be accessed electronically on the [School Wellness](#) webpage (<https://dpi.wi.gov/school-nutrition/wellness-policy>). 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: *None*

Corrective Action needed: *None*

SMART SNACKS IN SCHOOLS

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

- Smart Snack items, with the exception of side items, were checked for compliance. All side items observed were compliant, with one exception: the waffle fries, documented in the finding below.
- No second meals sold to students were observed on the day of review. However, please keep in mind that second meals are no longer permissible to be sold because a whole meal would not meet the Smart Snacks requirement. Meal items can be sold separately as non-program foods, if they comply with the Smart Snacks requirements.
- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that became effective July 1, 2014. Information on this regulation, along with a product calculator to

help determine compliance of various food items, can be found on our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage at (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). One soda vending machine was on and accessible, vending a product to the reviewer prior to breakfast, in violation of the time limits. Please see the finding below for details.

- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school site per school year, per the district's approval. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
 - Ensure if fundraiser is not conducted during the school day, but is tracked on the tracking sheet, that it is indicated somewhere that the sales did not occur during the school day to not raise issues when there are none.
 - Wisconsin Lutheran High School fund raisers were well documented (there were 2) and both were within guidelines. Thank you!

Findings and Corrective Action Needed: Smart Snacks in Schools

- **Finding #1:** *The seasoned waffle fries served as part of the reimbursable meal was also being sold as an a la carte item. Unfortunately, the fries (as they come; no additional seasoning added by site staff) exceed the Smart Snack limits on sodium (320mg vs. 200mg limit). Smart Snack exemptions do not include products like seasoned fries because they have added ingredients (e.g. salt in this case). As a reminder, fruits and vegetables with no added ingredients, the day or previous day's reimbursable meal entrees, and milk types allowed with reimbursable meals are always allowable for a la carte sales. Any side items with added ingredients - intended to be sold a la carte - must be input into the calculator to ensure compliance with the Smart Snack Rules. [This was a repeat finding, albeit with a different side item.]*

Corrective Action needed: *Discontinue the sale of the seasoned waffle fries as an a la carte item. Because the item is so popular, consider the procurement of a fry that would meet the Smart Snacks Rule.*

- **Finding #2:** *Shortly before the start of breakfast, the reviewer was able to purchase a soda from a vending machine located just outside the cafeteria. The machine is controlled by the vendor, and had not been programmed correctly to shut off access during school hours.*

Corrective Action needed: *The sponsor contacted the vendor and corrected this issue prior to the completion of the review. No further action is necessary.*

PROFESSIONAL STANDARDS

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

- Great job ensuring all staff are trained according to requirements. Everyone involved in the food service program had documented training on file to demonstrate compliance with the requirements. Thank you!

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.).

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: Professional Standards

Finding: *None*

Corrective Action Needed: *None*

WATER

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

- Water was available to all students in the dining area.

FOOD SAFETY AND STORAGE

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

- The sponsor in partnership with the FSCM had a robust food safety and storage program in place. Of particular note, the menu items by process category requirement was met with a large, poster-size wall display of all items broken down by category. Kudos to the team at Wisconsin Lutheran High School, this was one of the best examples of this requirement made into an operationally useful tool that the reviewer has seen.

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.
- 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>). Only one recommendation is to be made in this regard – all recipe should also include the process category on the recipe itself; however, all menu/recipe items were clearly identified on the process categories wall display.
- 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.

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Storage

- The on-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. No issues regarding storage practices were observed; everything was clean, well-organized, and labeled/dated as required.
 - SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
-

Time/Temperature Control for Safety (TCS) Food

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

Time as Public Health Control

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

Sharing and No Thank You Tables

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

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

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

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

Considerations

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

Wholesome Leftovers

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

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

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

Monitoring Log

Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is

available on the [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

Findings and Corrective Action: Food Safety

Finding: *None*

Corrective Action Needed: *None*

BUY AMERICAN

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

- *The vendor provided a list of items from the food distributor which covered most, but not all, items that were non-domestic. Overall, items are monitored for compliance with the Buy American process, but a few slipped through the cracks. Please see the finding below for additional information.*

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

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

SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin is identified on the label, then SFA must get certification from the distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with

proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.

- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

NOTE: When product label does not identify country of origin:

In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the TA notes above for sample certification language. This will be treated as TA for the 2018-19 school year but work with your distributor/supplier to move toward compliance.

Findings and Corrective Action Needed: Buy American

- **Finding #3:** *The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:*
 - Broccoli, Mexico
 - Cucumbers, Mexico

Corrective Action Needed: *The SFA will need to review the FSMC’s inventory check-in procedures and identify the procedures not followed and report the procedures not followed along with steps to ensure future errors do not occur again. The SFA should work with the FSMC to re-develop, if necessary, [procedures](#) for monitoring and receiving inventory (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>).*

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.
- There are additional record retention rules for CEP. “LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last

fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

- All free and reduced-price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

Findings and Corrective Action: Reporting and Recordkeeping

Finding: *None*

Corrective Action Needed: *None*

SCHOOL BREAKFAST PROGRAM (SBP) & SUMMER FOOD SERVICE PROGRAM (SFSP) OUTREACH

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

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

Breakfast Promotion

The breakfast participation in Wisconsin Lutheran High School is lower than participation at lunch. Breakfast in the classroom might be a great way to continue strong breakfast participation, or perhaps breakfast carts in the hallway. If you are interested in additional potential breakfast service models as well as financial models, these can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>). A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

Summer Meals

Sponsor does not participate.

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. As a reminder, USDA requires **all SFAs** to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

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

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator Phone:
608.266.7124; e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action: SBP and SFSP Outreach

- **Finding #4:** *Sponsor did not make available information to the community regarding the availability of summer meals (a requirement, even when not participating in SFSP).*

Corrective Action Needed: *Please provide a plan to inform the community/families of where their students can receive a free meal in the summer months. In your plan, reference one or more of the methods/resources listed above.*

5. OTHER FEDERAL PROGRAMS REVIEWS

AFTERSCHOOL SNACKS

Commendations/Comments/Technical Assistance/Compliance Reminders

- *Not applicable – sponsor does not participate in ASCP.*

FRESH FRUIT AND VEGETABLE PROGRAM (FFVP)

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

- *Not applicable – sponsor does not participate in FFVP*

SPECIAL MILK PROGRAM

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

- *Not applicable – sponsor does not participate in SMP.*

WISCONSIN SCHOOL DAY MILK PROGRAM (WSDMP)

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

- *Not applicable – sponsor does not participate in WSDMP.*

ELDERLY NUTRITION PROGRAM (EN)

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

- *Not applicable – sponsor does not participate in EN.*

6. COMMUNITY ELIGIBILITY PROVISION (CEP)

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

- *Not applicable – sponsor does not participate in CEP.*

The State Superintendent of Wisconsin Department of Public Instruction shares a vision that every student will graduate prepared for college and career. His 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 student success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage (dpi.wi.gov/statesupt/agenda-2017).

