

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

School Food Authority: Lakeland Union High School

Agency Code: 43-3647

School(s) Reviewed: Lakeland Union High School

Review Date(s): 2/18-19/19

Date of Exit Conference: 2/19/19

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, 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, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Lakeland Union High School for the courtesies extended to us 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- Of the 274 students eligible for free or reduced price meals in December, a sample of 164 students was pulled for review, and all but 1 was approved correctly.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** From the student sample reviewed for benefit's issuance, 1 student is receiving free benefits via DC benefit extension, but no match can be found, so student should not be receiving benefits.

Corrective Action Needed: Please notify this household of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be assessed for these errors for the review period (December) and month of on-site review (January). USDA allows a \$600.00 per program disregard before fiscal reclaim is necessary.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

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

Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** No Confirmation Review was conducted on the application selected for Verification, and the Verifying official did not sign the verified application,

Corrective Action Needed: Please submit a statement of understanding to do a confirmation review for Verification going forward. [Information on the verification process](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) can be found on our website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).

- ❑ **Finding #2:** The verified application did not qualify for reduced benefits after the SFA received income documentation because the application was verified using net income and gross income must be used for all income applications.

Corrective Action Needed : Please notify this household of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Completed on site, no further action required.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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 every school day (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). Field trip meals must be charged to the student at the time of delivery of the reimbursable meal. If students

do not come to cafeteria to pick up field trip meals, they must be checked off as the student receives the meal.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all staff at Lakeland Union High School for the warm welcome and cooperation during this Administrative Review (AR). The Food Service Staff has been a pleasure to work with, always helpful and receptive to suggestions. The food service department is doing a nice job offering a variety of fruit and vegetables, both fresh, canned, and dried, to students daily as well as multiple entree options. Everyone was welcoming, friendly, easy to work with, and worked well with each other.

Comments/Technical Assistance/Compliance Reminders

Training Opportunities

- Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training](#) webpage, under Upcoming Trainings (<https://dpi.wi.gov/school-nutrition/training#up>).
- Regular trainings are also offered on the School Nutrition Team webpage on the DPI website as [webcasts](#), webinars, and on-site trainings (<https://dpi.wi.gov/school-nutrition/training/webcasts>),
- Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>)

Breakfast

- Wisconsin Department of Instruction, School Nutrition Team has a [School Breakfast Program](#) web page with useful information to help schools reach their goals of increased participation. (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>)
- [National School Breakfast Week](#) (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/national-school-breakfast-week>)
- [Breakfast OVS Handout](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf>)
- Consider sending this [School Breakfast brochure](#) to families and caregivers to promote the benefits of breakfast. To increase participation consider offering a coffee beverage as part of a reimbursable breakfast. Coffee and espresso drinks are allowable beverages at the high school (grades 9-12) level. Ensure products are offered in acceptable portion sizes to be compliant with the Smart Snacks standards. Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar needs to be added

together when determining if the beverage meets the guidelines below.

Beverage Guidelines:

- Calorie-free beverages (for black coffee only)
 - <5 calories per 8 fl. oz.; ≤10 calories per 20 fl. oz.
 - Maximum serving size: 20 fl. oz.
- Lower-calorie beverages (for coffee with cream and/or sugar)
 - ≤40 calories per 8 fl. oz.; ≤60 calories per 12 fl. oz.
 - Maximum serving size: 12 fl. oz.

To help determine if coffee drinks are compliant, utilize the [Alliance for a Healthier Generation Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) (https://foodplanner.healthiergeneration.org/calculator/). If they are, you will be able to print a reference sheet showing compliance directly from the website as record keeping documentation. Working with your distributor is one way of discovering new options for students.

- Additional information on breakfast, including meal pattern and menu planning tools, can be found on the [School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program) webpage (https://dpi.wi.gov/school-nutrition/school-breakfast-program).

Documentation

- The USDA requires crediting documentation to be obtained by schools and retained on site for as long as the food item is offered to students. Documentation must be updated, as products are changed by manufacturers, so having a procedure in place to review documents bi-annually is recommended.
- Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. SFAs are required to document how foods offered credit towards weekly meal pattern requirements. This includes:
 - Labels off of products purchased and served are required
 - Child Nutrition (CN) label. A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that include these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the entire label off the package, make a copy of the label directly from the package, or take a picture of the label.
 - A product formulation statement (PFS). Required for any combination food, meat/meat alternate, or other processed food not found in the USDA *Food Buying Guide* for School Meal Programs. When a CN label is not available for a processed product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs.
- Product formulations change frequently, therefore it is important that nutrition facts labels, Child Nutrition (CN) labels, USDA Foods Product Information Sheets (USDA Fact Sheets), and Product Formulation Statements (PFS) on file are kept up-to-date. State-Processed Product Information is updated annually and can be found:
- [SY 2018-2019 State Processed Product Nutrition Information](https://dpi.wi.gov/sites/default/files/imce/school-) can be found here, please update products FSD is currently offering (https://dpi.wi.gov/sites/default/files/imce/school-

nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf). Each school year these items must be checked and updated as necessary.

- [USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) are organized by component and the USDA updates as needed (https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets). Please update your documentation, as old documents are currently on file.
- CN labels can be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed. Printing CN labels off of manufacturer's website is not adequate documentation for your program, CN labels must be captured from actual products purchased.
- More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).
Missing documentation.

Signage

- The National School Lunch Program (NSLP) regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at breakfast and lunch. Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) web page (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).
- The vegetables on the salad bar entree line are being used to meet the weekly vegetable requirements, portion sizes of at least $\frac{1}{8}$ cup each should be communicated to students with signage. [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage, under the heading Additional Signage Resources (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).
- Adequate signage helps ensure that students accurately select reimbursable meals. Signage was available at the beginning of the three serving lines; however, the salad bar serving line needs more detailed signage to guide students in creating a reimbursable meal. All available components should be listed. Signage must also state the *"students must take at least three full components, one of which is $\frac{1}{2}$ cup fruit and/or vegetable, or a combination."*

Production Records

- Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Production records are intended to be useful tools to record information prior to production, during production, and following production.
- Production record templates for breakfast and lunch can be found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). A copy of the production record requirements ("[Must Haves and Nice to Haves](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records)" list) can also be found at that link (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

Standardized Recipes

- Use of standardized recipes is another important part of USDA School Meals Programs. Any menu item that has more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used.
- This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Continue to use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. Information can be found on the [Standardized Recipes](https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes). We encourage viewing the webcast, [What's the Yield with Standardized Recipes?](https://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (https://dpi.wi.gov/school-nutrition/training/webcasts#sr).
- The (Chef) Meat Salad recipe (SL1) is not necessary if the nutrition professionals are not prepacking salads as an options on a reimbursable line for students to choose. Properly completed Salad Bar Production Records are needed, please see corrective action below.
- Including notes, such as “may be offered with...” is encouraged, but should be added to the recipe, an example would be at the bottom of the procedure list. This would ensure that whomever is preparing the recipe can easily understand what is included in the actual recipe and what could be offered with the final product.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding #1:** Current signage is located in a highly visible location for students as they enter the serving line, however, the signage is out of date and does not have the required “*students must take at least three full components, one of which is ½ cup fruit and/or vegetable, or a combination*” statement on it.

Corrective Action needed: Please update all signage to contain all required statements.

Updated Signage left on sight, no further action needed.

❑ **Finding #2:** Out dated and missing documentation.

Corrective Action Needed: Please provide the PHN with a detailed statement indicating how the FSD will ensure that all documentation is kept up-to-date, also please provide up dated documentation for the following items:

- All bread products (buns, rolls, slices, bagels, etc) offered to students
- Beef patty offered on 12.10.18
- All Schwann’s/Tony’s Pizza offered to students
- MaxStix offered on 12.11.18
- Spaghetti Noodles offered on 12.11.18
- Granola offered with yogurt parfait on 12.13.18
- Pancake wrap offered on 12.12.18
- Sausage pork patty offered on 12.11.18

❑ **Finding #3:** The production record templates currently in use are out of date and missing required information. Too many different types of production records are being used, for continuity of service and ease potential confusion within the nutrition professions, please consider using one style of production record. Current Production records are missing the following require information:

- The serving site is not listed on each of the different production records. Consider naming the areas and using that name to label each production record.
- Which meal is the production record for, this must be listed
- Date of service
- Planned/actual quantity prepared in purchase units (2 - #10 cans, 3 - 96 count cases)
- Meals planned, student and adult

The production record is your historical document, listing factors that effected meal service could also be listed (weather, field trips, illness)

Corrective Action Needed: Please provide the PHN with a week of completed production records for all lines, ensuring all required information is completed.

❑ **Finding #4:** The salad production records did not indicate portion sizes for each item offered to students.

Corrective Action Needed: Submit one week of updated salad bar production records with planned serving sizes for each menu item. Although not required, DPI's [Salad Bar Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-production-record.doc) or [Garden Bar Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/garden-bar-production-record.doc) may be used (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-production-record.doc;https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/garden-bar-production-record.doc).

❑ **Finding#5:** Standardized Recipes should be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen. For more information on what essential information must be on a standardized recipe, review the [Standardized Recipe Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf).

Corrective Action Needed: Please provide the PHN with the following recipes updated:

- Turkey Sub Sandwich offered on the senior line daily
- Hamburgers (6&16) offered on Monday, 12.10.18
- Sweet and Sour Cucumbers (#16) offered on Monday 12.10.18
- Crab Pasta Salad (#8) offered on Tuesday 12.11.18
- Spaghetti and Meat Sauce offered on Wednesday 12.12.18 (Noodles and Motz. Ch. Sticks should each have their own prep recipe)
- Vegetable Salad (#6) offered on Wednesday 12.12.18
- Coleslaw (#14) offered on Thursday 12.13.18)
- Whole Wheat Muffin Sandwich offered on 12.11.18
- Yogurt Parfait offered on 12.13.18

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. Thank you

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- **The district transferred in excess of \$54,000 into food service from the General Fund in the 17-18 school year.**
 - Included in that \$54,000 was \$23,097.83 transferred in to cover nonprogram food costs, and nonprogram foods should never run in a deficit.
 - Food cost is high at 46%. Thus, it is highly recommended that nonprogram foods be sold in all lines during all meal times and to assess the selling price, as these are add-on sales which can greatly help the bottom line.
 - Portion control on the salad bar line for high priced protein items would also aid in decreasing food cost because, as it is, the salad bar line is basically an all-you-can eat (fit on your try) buffet.
 - It is recommend to also utilize the meals per labor hour tool at <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/meals-per-labor-hour.xls>

Allowable Costs

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

Unpaid Meal Charge Policy

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

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** The district's written unpaid meal charge policy states refunds of student account balances over \$5.00 will be made upon withdrawal from district, and all balances must be refunded regardless of amount.

Corrective Action Needed: Provide a timeline to update the written unpaid meal charge policy and distribute to households.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 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, the abbreviated statement may be used, "This institution is an equal opportunity provider." Both statements should be in the same size font as the other text in the document.

Processes for complaints

- All SFAs should have procedures 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](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

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>).

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** The USDA nondiscrimination statement on the Direct Certification letter has been altered and USDA nondiscrimination statement may not be altered in any way.
Corrective Action Needed: Please update the nondiscrimination statement on your benefits determination letters and submit a copy as corrective action,
- ❑ **Finding #2:** The USDA nondiscrimination statement on menu is the incorrect statement.
Corrective Action Needed: Please update the nondiscrimination statement on the menu and submit the March menu as corrective action.

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
 - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
 - Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
 - Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
 - Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
 - Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
 - Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
 - Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).
- 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). Wisconsin Team

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

Findings and Corrective Action Needed: Wellness Policy

- ❑ **Finding #1:** SFA LWP does not identify the official responsible for oversight of the LWP to ensure school compliance.

Corrective Action Required: Please provide a timeline for updating the above items in your policy to become compliant with the final rule.

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

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.
- Authorized Representatives of Food Service Management Company operated SFAs are required to complete 12 hours of continuing education yearly as they function as the Food Service Director in FSMC operated SFAs.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- **Annual Training Requirements for All Staff**
Directors: 12 hours
Authorized Representatives of FSMC operated SFAs 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

Findings and Corrective Action: Professional Standards

- ❑ **Finding #1:** Training is not being monitored on a tracking tool.

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

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety

- 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.

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 or heat during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Because cold items are held outside of mechanical refrigeration, Time as a Public Health Control must be used.

Corrective Action Needed: Please develop a Time as a Public Health Control SOP and submit updated SOPs as attachment via email.

Buy American

- 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 identified on label, than SFA must get certification from 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 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 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 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 (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.
- 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 noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

- ❑ **Finding #1:** The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List:
 - Fresh Bananas - Honduras
 - Canned Tuna - Thailand

- Balsamic Vinegar - Italy
- Tomato - Mexico

Corrective Action Needed: Complete and submit a non-compliant tracking form for the above products.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Lakeland Union High School, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).

Findings and Corrective Action: SBP and SFSP Outreach

- ❑ **Finding #1:** Summer food service outreach was not provided to students.

Corrective Action Needed: Please provide a statement that you will notify students of the ability to receive free summer meals.

Carolyn Stanford Taylor, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. Her 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/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).