

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

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**School Food Authority:** Seymour Community School District  
**School(s) Reviewed:** Black Creek Elementary School

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**Agency Code:** 445138  
**Review Date(s):** 1/14/19–1/16/19  
**Date of Exit Conference:** 1/16/19

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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](http://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](http://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 Seymour Community School District for the courtesies extended during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for

taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. Many staff members were present at the entrance and exit conferences which showed the team-focus of the district and care taken district-wide to implement successful Child Nutrition Programs.

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

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## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### **Commendations:**

- Of the 374 eligibility determinations reviewed, only two errors were identified. These errors have been recorded on the SFA-1 form and are used to determine an error percentage. The error percentage was 0.53%, which is low enough to not require an independent review of applications or benefit issuance fiscal action.
- The determining official did an excellent job managing benefits issuance. There were minimal errors and the organization of the information was easy to follow. The determining official was able to answer questions thoroughly and easily explained any challenging scenarios that arose in the benefits issuance process. Great job seeking out training opportunities and working hard to stay abreast of changes in the program!

##### **Technical Assistance:**

#### Income Calculations

- All incomes reported on an application must be included in the eligibility calculation. There was one application in which reported incomes were skipped and not included in the eligibility determination. This error only resulted in a benefit change for two students on one application (see corrective action below). Care must be taken to ensure that all incomes are included in calculations to ensure accurate eligibility determinations.

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

- ✓ **Finding A:** One application affecting two students was incorrectly determined as free. One reported income was not included in the income calculation, thus resulting in a reduced-eligible household receiving free benefits.

**Corrective Action:** Send the household a notice of adverse action notifying the family that the free benefit will be decreased to a reduced benefit in 10 calendar days. Change the affected students' benefit to reduced in the software system. Submit a copy of the letter. *Corrected on-site; no further action required.*

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#### Verification

##### **Commendations:**

- The verifying official completed verification accurately and in a timely manner. The official took care to seek out answers in available resources and work with the DPI staff members when handling a challenging verification scenario. Great job completing the verification process!

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## Meal Counting and Claiming

### **Technical Assistance:**

#### Breakfast in the Classroom Point of Service

- Counts used for reimbursement claims must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal. If teachers are marking students off on a roster in the classroom before the student actually receives their breakfast, then they must double check that all of the students checked off did indeed receive their full, reimbursable breakfast at service time. Failure to double check if students actually receive their full reimbursable breakfast after they are checked off on the roster could potentially result in students being charged and claimed for meals they did not take. See corrective action below.

#### Field Trip Point of Service

- The point of service (POS) process for counting and claiming field trip meals appears to be acceptable and accurate based on the verbal description of the process. Students are not counted, claimed, or charged until after the accompanying teacher verifies that each eligible student received a full reimbursable meal.

#### Visiting Students

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

### **Findings and Corrective Action Needed: Meal Counting and Claiming**

- ❑ **Finding B:** While the counts for breakfast in the classroom at Black Creek Elementary appear accurate based on observation, some changes to the point of service (POS) are required. Some classrooms that used the students' morning breakfast order placed just before breakfast service to check students off on the POS roster did not double check that the students that ordered a breakfast actually received their breakfast during service time. If students choosing a breakfast will be marked off on the roster prior to receiving their meal, then the teacher must verify that each student marked off actually received their full meal during service time. In many classrooms, the teachers did utilize a double check system to ensure that students marked off on the roster just prior to service did receive their full reimbursable meal, however this did not occur in all cases.

**Corrective Action:** Develop and implement a plan that will ensure that all teachers mark off students on the roster after they receive their full reimbursable meal, or that the teachers utilize a double check system at service to ensure that students marked off just prior to service did indeed receive their full reimbursable meal. Submit a detailed description, including a timeline, of the plan to the consultant.

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## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### Menus, OVS, and Crediting

#### **Commendations:**

- Thank you to the food service director, school nutrition professionals, and staff at Seymour Community School District. The time and efforts spent preparing for and participating in the onsite review were much appreciated. It is great that students are offered numerous fruit and vegetable options each day at lunch. This is a smart way to expose students to new varieties and boost

consumption. The decision to offer the K-5 students breakfast in the classroom provides them with easy access to their morning meal and naming this “Brain Boost” is a clever way to promote how this meal may help their learning. Thank you for all that you do for the students of Seymour Community School District!

### **Technical Assistance:**

#### Meeting Meal Pattern Requirements when Offering Multiple Entrees

- The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entrée option, each entrée option offered is viewed as one “line” and therefore needs to meet the daily as well as the weekly requirements. This guidance can be found in the following documents:
  - [DPI's Lunch in a Nutshell](#)
    - Each serving line must meet the daily and weekly requirements, including vegetable subgroups, independently. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>).
  - [Memo SP 10-2012 \(v.9\) Questions & Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf>).
    - Question 1: For menu planning purposes, when multiple choice menus are served, how are minimums calculated? Answer: Weekly minimum - example 2: If a grade K-5 school offers a 1 oz eq grain item (salad) and a 3 oz eq grain item (pizza) every day (and instructs the student to select one option only), the minimum weekly offering is 5 oz eq grain (1 oz eq x 5 days). This menu would not meet the required weekly minimum for lunch of 8 oz eq (pg. 37).

#### Crediting Documentation

- 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.
- A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson).
- 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.

#### Crediting Discrepancies

- The production records and recipes submitted for the week of review contained many crediting discrepancies.
  - The production records for lunch on Monday incorrectly show the Cheese Fries, Ham Sandwich, and Cheese Fry Sauce to contain  $\frac{1}{8}$  cup red/orange vegetable.
  - Raw, leafy greens credit as half the volume served, so the 1 cup of lettuce offered at lunch on Monday would credit as  $\frac{1}{2}$  cup other vegetable.
  - The five mini corn dogs offered at lunch on Tuesday credit as 1.5 oz eq meat/meat alternate (M/MA) and 1.5 oz eq grain.

- Some of the fruit varieties offered at lunch on Tuesday had a planned serving size of  $\frac{1}{4}$  cup, but are credited as  $\frac{1}{2}$  cup fruit on the K-5 production record.
- The lunch production records for Wednesday are missing the planned serving sizes. This was discussed during the onsite review and the correct serving sizes were provided.
- $\frac{1}{2}$  cup of the Chili offered at lunch on Thursday credits as 0.75 oz eq M/MA when only crediting the beef crumbles. One cup of the Chili credits as 1.5 oz eq M/MA according to the amount of beef crumbles used in the recipe. Consider crediting the beans in the Chili as either a M/MA or vegetable.
- As a reminder, the  $\frac{1}{2}$  cup serving of the Chili and Chicken Noodle Soup without the accompanying sandwich could not count as the full M/MA component under Offer versus Serve (OVS). Consider increasing the serving size to one cup for all students to reduce confusion over what students may select for a reimbursable lunch on this day.
- The full Turkey Bologna Sandwich credits as 1.75 oz eq M/MA, using the 1.99 oz of Turkey Bologna called for on the recipe.
- The full Egg Salad Sandwich credits as 1.75 oz eq M/MA.
- The serving size for the sandwiches offered to K-5 students on Thursday during the week of review should be updated to reflect the half sandwich servings.
- The Cheeseburger offered at lunch on Friday includes crediting for  $\frac{1}{4}$  cup other vegetable. If a vegetable is offered with the Cheeseburger, it should be included on the recipe or listed separately on the production record.

#### Meal Pattern Grade Groups

- Rather than serving a K-5 meal pattern and a 6-8 meal pattern, it may be beneficial to simplify to a K-8 meal pattern for all K-8 students. A K-8 meal pattern makes menu planning easier for school nutrition professionals, and Offer versus Serve (OVS) is in place to minimize food waste.
- If choosing to continue to offer the K-5 and 6-8 meal patterns, consider using the production record templates that accommodate two grade groups on one page. Modifiable templates are available on the [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage, along with the list of production record “Must Haves” (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).
- All students included under the selected meal pattern(s) should be offered the same serving sizes for all menu items. It is allowable to continue to offer fruits and vegetables in  $\frac{1}{4}$  cup serving sizes for the younger students, as long as they have access to at least the daily minimum requirements of each. Consider updating the serving sizes for the Chili and Chicken Noodle Soup so that all K-5 students are offered the same serving size. This would simplify recordkeeping and crediting. Additionally, offering a serving size that provides a full 1 oz eq M/MA would allow students more flexibility in how they select a reimbursable meal on this day.

#### Production Records

- Be specific on production records about the identity, brand, and description of the items served. If an item is made using a recipe, include the reference number of the production record.
- Instead of just listing “muffin” at lunch, list both varieties of muffins separately.
- Fruit sizes (e.g. case count) should also be recorded.
- All items offered as part of reimbursable meal require a planned serving size, including condiments.
- The planned number of servings and quantities are accounted for on a log separate from the production record. This was discussed during the onsite review and is an acceptable alternative to keeping this information directly on the production record.
- A list of production record requirements (“[Must Haves and Nice to Haves](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records)”) and sample production record templates 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>).

#### Dietary Specifications

- Ingredients such as cheese sauce, margarine, and sugar that are added to some vegetables during the cooking process must be taken into account when determining the dietary specifications for the meal (calories, saturated fat, trans fat, and sodium). Consider using spices and seasonings to add flavor while reducing the caloric and fat content of some of these dishes.
- Any foods offered after the Point of Service (POS) cannot be credited toward the meal pattern, but must be taken into account when determining the dietary specifications for the meal. Since the homemade croutons are a creditable grain, consider offering them in the serving line. They could be offered in a pre-portioned cup or with the appropriate serving utensil to ensure the desired crediting.

#### Additional Breakfast Menu Options

- It was discussed during the onsite review that certain menu items, such as the Rice Krispies Treats, have been removed from the breakfast menu as a way of lowering the sugar content of the breakfast offered. This is a commendable practice, especially since children form their taste preferences early on. However, as noted, changes to the items offered at breakfast are not always immediately accepted by students.
- The [Breakfast Menu Planning](#) webpage contains links to resources that may provide menu items to incorporate into your breakfast (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/menu-planning>). The SFA's food distributor or neighboring districts may also provide ideas on what works well in other schools. Additionally, consider gaining student feedback on foods they would be excited about in the morning.

#### Breakfast Signage

- Breakfast and lunch signage was posted and filled in with the daily menu. However, breakfast signage did not specify the number of food items that each menu item was planned as nor the number of items from each component that students could select. Technical assistance was provided and staff filled in the signage with that morning's menu and the correct number of items.

#### Pre-K Meal Pattern

- If you choose to offer any pre-K students in the district meals and wish claim them under the School Breakfast Program or National School Lunch Program, they must be served using the Child and Adult Care Food Program (CACFP) meal pattern when not served at the same time and in the same place as any K-12 students. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

#### Social Media

- It is encouraged to share photos of the SFA's meals, decorations, and events with the DPI School Nutrition Team for posting on the social media accounts. Visit the [School Nutrition Programs](#) webpage and look for the "share" button on the right side of the page (<https://dpi.wi.gov/school-nutrition>).

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

- ❑ **Finding C:** There was a daily grain shortage at lunch on Monday, Tuesday, Wednesday, and Friday during the week of review for K-5 students. There was a daily grain shortage at lunch on Monday, Tuesday, and Friday during the week of review for 6-8 students. K-5 and 6-8 students must be offered at least 1 oz eq grain daily at lunch, regardless of which entree they choose. The following days contained daily shortages:
  - Monday: 0.75 oz eq grain from the Pumpkin Chocolate Chip Muffin for both K-5 and 6-8 students
  - Tuesday: 0.75 oz eq grain from the Pumpkin Chocolate Chip Muffin for both K-5 and 6-8 students

- Wednesday: 0.75 oz eq grain from the Stuffing offered as the only grain with the Turkey Gravy for the K-5 students only. K-5 students selecting the Pumpkin Chocolate Chip Muffin this day were also able to select the 0.75 oz eq of Stuffing, thereby meeting the daily minimum grain requirement. The production record shows that 6-8 students were also offered a slice of bread to meet the daily grain requirement for all entrée choices.
- Friday: 0.75 oz eq grain from the Pumpkin Chocolate Chip Muffin for both K-5 and 6-8 students

**Corrective Action:** These meals must be corrected to provide the K-5 and 6-8 students access to at least 1 oz eq of grain daily at lunch. You may choose to submit updated recipes showing that the Pumpkin Chocolate Chip Muffin and Stuffing each credit as at least 1 oz eq grain. Alternatively, you may choose to add additional grain products to the menu on these days. If additional grain products are added to the menu or substituted, submit crediting documentation to show the daily requirement has been met on each day of this week. Keep the weekly grain requirement in mind when correcting the daily grain shortages.

□ **Finding D:** There was a weekly grain shortage at lunch for K-5 and 6-8 students during the week of review. K-5 and 6-8 students must be offered at least 8 oz eq grain per week at lunch.

The following minimum grain amounts were offered to K-5 students:

- Monday: 0.75 oz eq grain from the Pumpkin Chocolate Chip Muffin
- Tuesday: 0.75 oz eq grain from the Pumpkin Chocolate Chip Muffin
- Wednesday: 0.75 oz eq grain from the stuffing offered as the only grain with the Turkey Gravy
- Thursday: 2.25 oz eq grain from the Pumpkin Chocolate Chip Muffin, bread slice, and crackers
- Friday: 0.75 oz eq grain from the Pumpkin Chocolate Chip Muffin
- Weekly total: 5.25 oz eq

The following minimum grain amounts were offered to 6-8 students:

- Monday: 0.75 oz eq grain from the Pumpkin Chocolate Chip Muffin
- Tuesday: 0.75 oz eq grain from the Pumpkin Chocolate Chip Muffin
- Wednesday: 1.75 oz eq grain from the stuffing or Pumpkin Chocolate Chip Muffin and bread
- Thursday: 2.25 oz eq grain from the Pumpkin Chocolate Chip Muffin, bread slice, and crackers
- Friday: 0.75 oz eq grain from the Pumpkin Chocolate Chip Muffin
- Weekly total: 6.25 oz eq

Additionally, the daily Uncrustable option offered during the week of review contributed to a weekly grain shortage for K-5 students at lunch. Even when factoring in the additional grains offered as sides, the quantity of grain offered over the week was still short of the weekly requirement of 8 oz eq. The following grain amounts were offered to K-5 students with the Uncrustable entrée option:

- Monday: 1 oz eq grain from the Uncrustable
- Tuesday: 1 oz eq grain from the Uncrustable
- Wednesday: 1.75 oz eq grain from the Uncrustable and stuffing
- Thursday: 2.50 oz eq grain from the Uncrustable, bread, and crackers
- Friday: 1 oz eq grain from the Uncrustable
- Weekly total: 7.25 oz eq

The 6-8 students were offered enough grains in addition to the Uncrustable to meet the weekly grain requirement for this entree option.

**Corrective Action Needed:** Submit a written statement explaining what will be done to the week of review so that at least 8 oz eq grain is offered to all K-5 and 6-8 students, regardless of their entrée choice. Review the [lunch meal pattern table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) for reference (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf).

*Fiscal action is required for select repeat violations found during an Administrative Review (AR). Because a weekly grain shortage at lunch was found during the last AR as well as the current AR, fiscal action will be applied. There will be a re-claim for lunch meals offered during the week of review that contributed to the weekly grain shortage. The following finding was documented from the School Year (SY) 2014=2015 AR, which is a repeat finding during the current AR:*

- *Menu for Lunch- the weekly grain and meat/meat alternate requirements are not being met due to the peanut butter and jelly sandwich that is served which only contributes 1 oz of grain and 1 oz of meat/meat alternate. It was recommended that a 1 oz cheese stick (or 4 oz yogurt) be served with the sandwich that is made on two slices of bread instead of one.*

❑ **Finding E:** The Nutrikids recipes submitted for the week of review and the standardized recipes used onsite in each meal preparation location were incomplete and contained discrepancies between the two recipe forms.

- The sliced bread must be included in the standardized sandwich recipes or be recorded separately on the production record.
- The quantities called for in the procedures section of the Chili recipe used onsite do not match with the quantities called for within the ingredients section. Additionally, the exact amount of water needed to produce the desired yield must be included on the recipe.
- The Egg Salad Sandwich recipe should be updated to reflect the type of eggs actually used. If a sandwich is made using the #12 scoop of egg salad with only one slice of bread, a separate recipe should be created.
- The total yields vary between the Nutrikids recipes and those used onsite for the Ground Bologna Sandwich and the Chicken Noodle Soup. The yield providing the lowest creditable amounts was used to credit these recipes for the week of review.

**Corrective Action:** Revise and submit standardized recipes for the Chili, Egg Salad Sandwich, Ground Bologna Sandwich, and Chicken Noodle Soup offered during the week of review. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the [Standardized Recipes webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

❑ **Finding F:** The crackers offered on Thursday during the week of review were not whole grain-rich. These crackers should be replaced with a whole grain-rich product or they may be offered as an extra and not credited toward the grain component.

**Corrective Action:** Submit crediting documentation for any replacement grain products or submit a statement with your decision to offer the crackers as a non-creditable extra.

✓ **Finding G:** The production record template uses one column for either the number of servings prepared or the quantity (in purchase units) prepared. This information should be broken out into two columns and should be documented for each menu item.

**Corrective Action:** Submit a copy of your updated production record showing two separate columns; one for the number of servings prepared and one for the quantity (in purchase units) prepared. *Corrected onsite; no further action needed.*



- ❑ **Finding H:** The alternate meal option (combinations of the Uncrustable, muffins, cheese stick, and yogurt) is not on the monthly menu.

**Corrective Action:** Submit a copy of the printed monthly menu showing this option is available daily for students.

*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.*

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### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### Technical Assistance:

##### 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 non-program food compliance which is highly recommended. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- 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 costing over \$5000 per unit. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other.”
  - Under “Purchases Services” report any time someone is paid for services provided such as equipment repair and health inspections.
  - Under “non-program 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.

##### Excess Cash Balance (ECB)

- SFAs must limit the net cash resources in order to not exceed three months average expenditures. The ending fund balance for the 2017-18 school year exceeded the three months of average operating expenses, which is considered an ECB. The SFA also had an ECB in 2016-17 and was required to develop and submit a spend-down plan to DPI. The spend-down plan approved as of 2/23/18 involved the purchase of several pieces of equipment which were purchased in the school year 2017-18. The SFA still had an ECB at the end of 2017-18, and will receive another notice from DPI in the spring to develop a new spend-down plan. Some options to consider for spending down:
  - Provide reduced-eligible students with free meals. (See USDA Memo SP 17-2014).
  - Improve quality and variety of foods offered.
  - Increase marketing of the school meal program to increase participation.
  - Purchase additional or updated kitchen equipment, if needed.
  - Provide additional training to staff, which can include sending staff to conferences on school nutrition related topics.
  - Offer more local products or start a Farm to School program.

- Applying for a paid lunch equity (PLE) exemption for the 2019-20 school year is an option that cannot be used as a means to reduce excess cash balance, but may help prevent excess cash balance in future school years.

#### Account Balance Refunds

- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed,” they cannot be kept by food service, unless *paid* households have *chosen to donate* those funds to the school food service account.
- Households that cannot be contacted and refunded in full must have all funds left in the student meal accounts turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).
- There is currently no approved flexibility to the refund requirements to allow a dollar threshold to be set for permitting or denying refunds. Please reference the [DPI SNT Financial Q & A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf) refund section on page 14 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>).

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

- ❑ **Finding I:** The SFA offers non-reimbursable alternative sandwich meals free of charge to students with negative balances that exceed the district’s established allowable negative balance threshold. Because these meals are prepared with food service funds but are not charged to households or claimed for reimbursement, these meals must be funded from a non-federal source. Fund 50 may not absorb the cost of providing these alternative meals free of charge to students. There is currently no tracking system in place for these meals, thus a fund transfer has not been made to cover the meal costs.

**Corrective Action:** Develop and implement (as soon as possible) an SFA-wide plan for tracking these alternative sandwich meals. Each school must have a consistent, reliable method of tracking these meals when they are served. Because the meals are not charged to households or claimed for reimbursement, it is not necessary to track the names of the individual students that receive the meals—just the total number served. At the end of the month or year, the tracking sheets must be used to calculate and execute a transfer from a non-federal fund to Fund 50 to cover the costs of these meals. Submit a detailed description of how these meals will be tracked, including a copy of the tracking tool that will be used.

- ❑ **Finding J:** The annual financial report (AFR) contained several errors.
  - Revenues were not allocated for non-program foods.
  - Only food cost was allocated to the Special Milk Program.
  - Revenues and expenditures were not allocated to the Wisconsin School Day Milk Program
  - Expenditures were not allocated to non-program foods.
  - Food expenditures allocated to the Special Milk Program seem excessively high for the volume of the program and warrant additional investigation.
  - The grand totals for revenues and expenditures on the AFR do not match those reported on the PI-1505 report. The beginning and ending fund balances reported on the AFR appear correct. This discrepancy between the AFR and PI-1505 must be investigated and corrected.

**Corrective Action:** Correct the AFR to resolve the errors described. This cannot be done electronically and must be completed by contacting Jacque Jordee at [jacqueline.jordee@dpi.wi.gov](mailto:jacqueline.jordee@dpi.wi.gov) or 608-267-9134 and fax or email her an updated report to complete a manual update. Notify the consultant when the report has been resubmitted and send the consultant a copy of the updated report.

## Revenue from Non-Program Foods

### Technical Assistance:

#### Non-Program Food Revenue Requirements

- Non-program foods include: adult meals, a la carte, extra entrees, extra milk (for cold lunch or milk purchased at milk break), vended meals (meals sold to other agencies), catering, and food service operated vending machines. Since non-program foods include adult meals and extra milk, these expenses and revenues must be separated from program foods.
- All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Non-program food costs and revenues must be separated from program food costs and revenues.
- The USDA Non-Program 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>).

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} > \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

#### Catering Pricing

- The SFA utilized the top section of the DPI non-program food revenue tool to establish a price for a catering event (i.e. Bus Driver Breakfast). The top section of the tool can assist in determining a selling price for a food item assuming a 38% food cost, but this is not the purpose of the tool and the tool does not need to be used when establishing a price for catering events.
- When pricing out a catering event, the full cost of the event must be paid back to Fund 50 since the food served is non-program food. The cost of food, labor, and supplies associated with the event must be considered when establishing the price charged for the event. The SFA may mark-up catering events as they see fit, as long as at least the full cost is recovered.

#### Findings and Corrective Action Needed: Non-Program Foods Revenue

- ❑ **Finding K:** The SFA allows students to purchase second meals at the adult price. Any food items sold to students outside of the reimbursable meal must meet Smart Snacks nutrition requirements and be charged a la carte prices per item. Selling students bundled second meals at the adult price does not meet Smart Snacks requirements. Additionally, the non-program foods revenue tool has not been completed for the current school year, and the SFA sells more than just adult meals and milk. At the time of review, the only other non-program food sold to students was a second bundled meal sold after the purchase of a full reimbursable meal. Please note that milk served to paid eligible students free of charge at “milk break” when the Wisconsin School Day Milk Program is offered is also considered a non-program food and must be included in the tool.

**Corrective Action:** Disallow the sale of bundled second meals to students. Reconfigure the cashier screens as needed to allow for a la carte items to be charged at the appropriate prices per item instead of as bundled second meals. Retrain staff to begin selling all items purchased outside of the reimbursable meal at a la carte prices per item. Notify students of these changes, as necessary, to ensure the discontinuation of second meals is understood. If a la carte items will be allowed as part of the corrective action plan, please specify which items students will be able to purchase and the

designated selling prices. The non-program food revenue tool should be completed after the second meal procedures are modified and implemented, but before the end of the school year. To satisfy the corrective action, submit a detailed description of the steps taken to discontinue the sale of bundled second meals to students, including how a la carte items (such as extra entrees) will be served and charged going forward. Please also submit a statement of understanding that the non-program food revenue tool must be completed at least annually, and that it will be completed before the end of the current school year to assess non-program food revenue compliance.

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#### 4. GENERAL PROGRAM COMPLIANCE

##### Civil Rights

##### Technical Assistance:

##### And Justice For All Poster

- The *And Justice For All* poster must be displayed in a prominent location and be visible to program participants. The position of the poster should allow participants to easily read it, therefore the height of the poster should be at an appropriate level for the children in each school.

##### 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 of the state agency within five days. This should be included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\_combined\_6\_8\_12.pdf).
- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](#) resource.

##### 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>).
- Food service staff, including the food service director, that are responsible for implementing special dietary requests should have copies of the signed medical statements on file for the students requiring accommodations. To avoid information getting lost in translation, it is crucial that the people preparing these meals can easily reference the exact information from the medical practitioner regarding the accommodation needed. Please work with involved staff members to

ensure that the necessary people receive copies of the signed medical statements for special dietary accommodations.

- If accommodations will be made in the future based on signed medical statements, the food service director should receive and retain copies of the signed statements submitted by the household. It is crucial that the food service director be able to easily access the exact accommodation request so that it can be implemented correctly and safely according to the medical practitioner's directions.
  - School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
  - Juice or water may not be substituted for fluid milk unless juice or water is specified as a substitution on a medical statement signed by a licensed medical practitioner. An SFA may choose to offer lactose-free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA without a medical statement. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
  - 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>).
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### **Local Wellness Policy (LWP)**

#### **Commendations:**

- Seymour Community School District values the wellness of the students, families, staff, and community as evidenced by the committees established for wellness and nutrition promotion. The wellness committee made up of staff representatives meets to focus on wellness events in the district and the LWP. Additionally, the SPAC group is made up of student and parent volunteers that meet to discuss food-service topics and provide suggestions regarding the school meal programs. It is great to see that there is involvement in wellness activities across the school district!

#### **Technical Assistance:**

##### **Recommended Updates**

- While the SFA's LWP was fairly comprehensive, detailed, and contained all required content areas, there are several suggestions for improvements.
  - Some of the links provided in the policy appear to be broken. It is recommended to review all external links and modify as needed.
  - There is a link to the 7 CFR Parts 210 and 220 Final Rule from 2012 in the school meals section of the LWP. This resource may not be the most updated version of 7 CFR for NSLP. It is recommended to link to the [USDA FNS version of 7 CFR](#) that was last updated in September 2017 (<https://www.fns.usda.gov/part-210%E2%80%94national-school-lunch-program>).
  - The non-discrimination statement on the LWP is outdated and should be updated to the [current statement](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/snt-mail-120415.docx>).

### Wellness Policy Input

- The wellness committee responsible for updating and implementing the LWP consists of teachers, staff, administrators, health insurance company representatives, and school board members. The SPAC group involves parents and students, but this group does not provide input or participate in LWP updating. The group responsible for developing, implementing, reviewing, and updating the LWP must consist of a diverse group of stakeholders. While the established wellness committee does consist of a variety of stakeholders, parents and students do not currently provide input on the LWP itself. It is recommended to allow parents, students, and other community members to attend the LWP portions of wellness committee meetings so they can provide input. Alternatively, the SFA could allow the SPAC group to periodically provide input on the LWP at their meetings. The SFA should consider ways that parents, students, and other community members can be involved in the local wellness policy development, implementation, and revisions.

### Frequency of LWP Review and Update

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually.

### Triennial Assessment

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

### **Resources:**

- Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.

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## **Smart Snacks in Schools**

### **Technical Assistance:**

- The Smart Snacks Final Rule provides nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more

information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

- It is recommended to use the [Alliance for a Healthier Generation Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) to assess product compliance (<https://foodplanner.healthiergeneration.org/calculator/>). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

### **Findings and Corrective Action Needed: Smart Snacks**

- ❑ **Finding L:** Students are allowed to purchase full second meals for a bundled price. This is not an allowable practice as all items must individually meet the Smart Snacks standards and must be sold separately. As a reminder, entrée items are exempt from the Smart Snacks standards on the day of and day after they are offered as part of the National School Lunch Program or School Breakfast Program.

**Corrective Action:** Submit a written statement explaining how second portions of all menu items will be handled going forward. This may be combined with the corrective action for Finding K.

- ❑ **Finding M:** The beverages in the vending machine that is available for the student purchases during the school day are not Smart Snacks compliant for K-8 students. Only plain water, 100% juice, or milk are allowable Smart Snack beverages for K-8 students. Please refer to the [Smart Snacks In a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) for the allowable beverages and size restrictions (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf>). If the vending machine remains available to only students in grades 6-8 during the school day, the beverage sizes for middle school students may be used.

**Corrective Action:** Submit a written statement explaining what will be done with this vending machine to comply with the Smart Snack regulations

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## **Professional Standards**

### **Technical Assistance:**

#### **Training Requirements**

- Annual training must be job-specific and intended to help staff perform their duties well. The required annual training hours vary according to the staff member'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.). Completion of annual civil rights training and time spent working with DPI staff members during the administrative review can be counted as training hours.

#### **Annual Training Requirements**

- There are different annual training requirements based on each staff person's duties in the school nutrition programs.
  - 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.
- Off-site and on-site materials as well as discussions with staff members indicated that:
  - The person listed on the contract as the food service director should indeed be considered the director. In some conversations, this person was designated as the "food service manager" or "food service supervisor," and the authorized representative (authorized rep)

was considered the “food service director.” It is advisable to keep the “food service supervisor/manager” designated as the director, and not designate the authorized rep as the director. The person designated as the director must meet minimum hiring standards if put into that role after July 1, 2015, and must complete 12 hours of training annually. Please reference the [Professional Standards webpage](#) for additional information on role designation and minimum hiring standards for directors (<https://dpi.wi.gov/school-nutrition/professional-standards>).

- There are three staff members that should be designated as non-school nutrition staff with job duties pertaining to school nutrition. These people are the determining/verifying official, the authorized rep/business manager, and the administrative assistant responsible for claim submission. These three people must complete four hours of professional standards training annually, including civil rights training.

#### Training Tracking

- The three non-school nutrition program staff with job duties pertaining to school nutrition programs all completed more than the four required hours of training for 2018-19. Each of these staff members retain their own certificates/proof of training, but they do not track their hours on a tracking tool. It is suggested that these staff members utilize a tracking tool for recording their annual professional standards hours to assist in monitoring if the annual requirements are met. A template tracking tool is posted to the [Professional Standards](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

#### Two Year Flexibility

- SFAs may utilize the two year flexibility offered by the state agency for professional standards training. The SFA may define a two year period and allow staff members to complete twice their annual training hour requirements over two years. For example, a full time staff member could complete 12 hours of training over the defined two year period as opposed to completing six hours every year. This option does not require additional approval from the state agency.

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### Food Safety

#### **Technical Assistance:**

##### Food Safety Plans

- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria including on field trips.
- It is encouraged that the food service director continue modifying and updating the SOPs in the food safety plan as processes change and as the SOPs can be made more specific to actual practices occurring in the operation.

##### Field Trip Meals Standard Operating Procedure (SOP)

- While field trip meals are not offered at the review site, other schools in the district do offer field trip meals. Each school serving field trip meals must have a corresponding SOP in the school's food safety plan. See Food Safety Plans information above. A [template field trip SOP](#) which can be modified to be site-specific is available on the [food safety webpage](#) (<https://dpi.wi.gov/school-nutrition/food-safety#templates>).

##### Unserviced Breakfast Bags

- The set-up of breakfast in the classroom at Black Creek results in very few breakfast bags taken to classrooms remaining unserved. Nearly all of the reimbursable breakfast bags taken to classrooms are served to students. Currently, any unserved bags remain in the classroom and are discarded at



the teacher's discretion. The food service department could request that any unserved bags be returned to the kitchen. Food service staff could then save any items from the unserved bags that could be safely used at a later meal service (such as unopened applesauce, unopened cereal, etc.) in accordance with the food safety plan and Wisconsin Food Code. This may be an option to consider in the future if a significant amount of bags go unserved after delivery to classrooms in order to reduce food waste.

### Sharing Tables

- 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. Sharing tables are only 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 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 tables is not for adults (e.g. food service staff, aides, teachers, custodians).
- Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. "Wholesome" must be defined by the SFA as part of the SOP. Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items. Food safety decisions surrounding sharing tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

### Findings and Corrective Action Needed: Food Safety

✓ **Finding N:** The most recent food safety inspection report was not posted in publicly visible locations at the review site. The posted report was not the most recent one.

**Corrective Action:** Obtain and post the most recent food safety inspection conducted at Black Creek Elementary. *Corrected on-site; no further action required.*

- ❑ **Finding O:** During observation of breakfast in the classroom at Black Creek Elementary, several classrooms were utilizing sharing tables to allow students to give away unwanted meal items from their breakfast bags to other students. There is not a standard operating procedure (SOP) in the school's food safety plan for sharing tables.

**Corrective Action:** Immediately discontinue sharing tables or take steps to implement the sharing tables correctly. To implement the sharing tables correctly, a site-specific SOP must be developed. The local sanitarian should be included in SOP development to ensure that the SOP meets all local and state food safety standards.

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### Buy American

#### **Technical Assistance:**

- 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, than 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 accepted within an email.
  - The 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 that 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](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/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](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) 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.
- For domestic products without country of origin labeling (COOL), consider the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- More information on this new requirement 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 P:** The following products were identified in the SFA’s storage area as non-domestic and not documented:
  - Mandarin oranges (China)
  - Canned olives (Morocco)

**Corrective Action:** Submit a copy of the noncompliant product form for each of the above products. *Corrected onsite; no further action needed.*

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### **Summer Food Service Program (SFSP) Outreach**

#### **Technical Assistance:**

##### **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 Seymour Community School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months, per 7 CFR 210.12 and 210.18.
- 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 the 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](mailto:amy.kolano@dpi.wi.gov)

### **Findings and Corrective Action Needed: SFSP Outreach**

- ❑ **Finding Q:** The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP), as required per 7 CFR 210.12 and 210.18.

**Corrective Action:** Submit a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please be specific and include details regarding the method of communication and timeframe for distributing SFSP outreach materials.

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### **Special Milk Program (SMP)**

#### **Technical Assistance:**

##### **CACFP Milk Regulations**

- The updated meal pattern for the Child and Adult Care Food Program (CACFP) was required to be implemented, when applicable, by October 1, 2017. The CACFP meal pattern does not allow flavored milk to be served to children aged 1-5 years old and not yet in kindergarten—these children are allowed unflavored milk only. This updated meal pattern applies to the National School Lunch Program, the School Breakfast Program, and the Special Milk Program. For more details, visit the [Infants and Preschool in NSLP and SBP webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). The [comparison chart for milk programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smp-wsdmp-comparison-chart.pdf) also details allowable milk types for milk programs according to ages (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smp-wsdmp-comparison-chart.pdf>).
- Currently, Seymour Community School District serves their pre-K students in the SMP. Pre-K students do not have access to breakfast or lunch. The CACFP meal pattern must be followed for the SMP for the pre-K students. It is understood that stopping service of chocolate milk in the SMP mid-school year could be disruptive to students. Therefore, it is acceptable to cease service of flavored milk in SMP beginning in the 2019-20 school year. This was discussed on site and the school officials acknowledged the need and the plan to serve only unflavored milk in SMP beginning in 2019-20.

##### **Point of Service (POS)**

- During program observation, the POS appeared acceptable and accurate. In the observed classrooms, students use magnets with their names to select the type of milk they want daily. Shortly after students vote for their milk choice, a tally is recorded on an erasable card. A student helper and accompanying teacher use the card to pick up the appropriate number of milks from the cafeteria. On the way back to the classroom, the tally card is dropped off in the office for daily recording on a master spreadsheet.
- While milks are not counted at the time they are distributed to students, the system in place leaves little room for error and is not based on “back out” counts. Because the program is non-pricing, only the total number of half-pints served to eligible students must be recorded. For this reason, recording total milks taken from the cafeteria at SMP service time for claiming purposes is acceptable. In an ideal situation, the final counts recorded on the card and submitted to the office for claiming would be taken in the classroom at the time the milk is distributed to students, but the current system is acceptable and appears accurate.

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

- ✓ **Finding R:** The Special Milk Program (SMP) claim must include the weighted average price per half pint of milk, and be calculated monthly. Simply using the highest cost per half pint or simple average

does not meet this requirement. Reference the [SMP Claiming Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smp-claims-manual.pdf) for additional details (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smp-claims-manual.pdf>).

**Corrective Action:** Starting with the next SMP claim, begin calculating the weighted average cost per half pint of milk based on monthly milk invoices for the schools participating in SMP. The claim preparer began calculating and comparing the weighted average prices based on available data and indicated understanding of the proper procedures going forward. *Corrected on-site; no further action required.*

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

#### **Commendations:**

- The school staff members responsible for administering the milk programs appear to have effective procedures in place to yield accurate milk counts in each milk program. The WSDMP and SMP were both operated in accordance with the respective guidelines. It can be challenging to offer both milk programs concurrently, but both were well-implemented at Black Creek Elementary.

#### **Technical Assistance:**

##### **Wisconsin Produced Milk**

- Per the Agreement for the WSDMP, the SFA agrees to serve Wisconsin-produced milk. Please check with the distributor to verify that the milk received is fully or partially Wisconsin-produced. It is recommended to obtain this verification in writing for future reference. It may also be advisable to include the “Wisconsin-produced” stipulation in the SFA’s milk bid.

##### **Substitutions**

- In the WSDMP, the only allowable substitution for milk is full strength fruit or vegetable juice which may be offered when a child has a documented allergy to milk, metabolic disorder, or other conditions which prohibits him or her from drinking milk.

##### **Price per Half Pint on Claim**

- On the claim, the school’s cost per half pint of milk served in WSDMP should be reported and supported by documentation (such as a milk invoice). A reasonable cost for the milk served in the program should be considered. For example, if the school serves primarily skim chocolate milk in the program, the cost per half pint of skim chocolate milk would be more reasonable and reflective than using the cost per half pint for all types of milk served as a component of NSLP. The claim preparer has been using the cost per half pint of chocolate milk on the June milk invoice to pull a cost for the claim. Review of WSDMP guidelines suggests that this is an acceptable means to determine the cost per half pint for the claim.

##### **Point of Service (POS)**

- During program observation, the POS appeared acceptable. In the observed classrooms, students use magnets with their names to select the type of milk they want daily. Student helpers pick up the appropriate number of cartons of each type from the cafeteria according to the classroom’s counts. Upon return to the classroom, the teachers call off students’ names based on their milk selections made with their magnetic names. After all children that voted to receive a milk are called and take their milk, the teachers check off each student by name that received a milk on a class roster.
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The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

