

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

School Food Authority: Shiocton School District
School(s) Reviewed: Shiocton Elementary School

Agency Code: 445348
Review Date(s): 1/16/19–1/17/19
Date of Exit Conference: 1/17/19

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

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

General Program Reminders/Updates:

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Shiocton 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 indicated 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 festively decorated, which added a special appeal. Interactions between staff and students during meal times were positive and customer-service focused.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Of the 158 eligibility determinations reviewed, 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 1.27%, which is low enough to not require an independent review of applications or benefit issuance fiscal action.

Technical Assistance:

Income Calculations

- All incomes reported on an application must be included in the eligibility calculation. There were several applications in which reported incomes were skipped and not included in the eligibility determination. These errors 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.
- When incomes are reported in mixed frequencies, the incomes must be annualized and compared to the income eligibility guidelines. Technical assistance was provided to the determining official on how to include annual or seasonal income reported on Section F of the application in the total income calculation, as income in F was not correctly accounted for on one application. This did not result in a recordable benefit issuance error.

Application Denial Letters

- As described on page 56 of the [Eligibility Manual](#), the household notification of denial must advise of the following (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>):
 - Reason for denial of benefits
 - Right to appeal
 - Instructions on how to appeal
 - Ability to reapply for benefits at any time during the school year
- Please reference the [DPI Approval/Denial template letter](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/letter-to-households.doc>).

Double Check of Applications

- It is not necessary to double check all application determinations unless notified in writing by DPI that an independent review of applications is required. The confirming official has been double

checking all applications and signing off in the confirming official box on the applications. The confirming official signature box is reserved for signatures and dates during the confirmation review in the verification process (see Verification section of report). If the SFA wishes to continue with the practice of having a second person other than the determining official double check all applications, the person completing the double check should sign the back of the application below the determining official—not in the confirming official or verifying official section.

Transferring Students

- Transferring the eligibility determination between Local Educational Agencies (LEAs) ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.
- Wisconsin DPI requires source documentation of the student's previous eligibility. Source documentation means that the information originally used to determine the student's meal eligibility is shared with the school requesting the information for the new or transfer student. Source documentation may include a copy of the original application or a copy of a direct certification run with the student's name listed. A phone call or copy of a benefit approval letter are examples of documentation that would not be sufficient to establish the new or transfer student's eligibility.

Disclosure

- For anyone receiving individual eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure Agreement for School Staff](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) form is located on the SNT website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>). An example would be a school secretary receiving a student's free/reduced eligibility information with parental consent for the purpose of waiving school registration fees—the secretary in this scenario should complete a disclosure form.
- Disclosure statements would not be needed for the business manager and food service director who have access to student eligibility information for program purposes. These staff members must have access to this information to run the programs properly and they also must complete annual civil rights training, which covers important disclosure topics.

Extension of Benefits Letter

- The determining official has modified the DPI joint custody letter template to notify families of extension of benefits for children not matched themselves to direct certification. It is acceptable to modify template letters, however it is recommended to add further clarification to this letter. Currently, the letter used by the SFA references "children [residing] in more than one household," which may not be the case for all households receiving the extension of benefits letter. For the sake of clarity for households, it is encouraged to add a statement that explains that the children listed on the letter are eligible for benefits because they reside in more than one household or reside in a household with someone who receives Food Share, W-2 cash benefits, Medicaid, or FDIPR.

Training

- It is highly recommended that the determining and verifying official continue seeking out training opportunities pertaining to free/reduced meal benefit management. Please explore the [DPI webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts) for pertinent topics (<https://dpi.wi.gov/school-nutrition/training/webcasts>). In-person training opportunities are posted on the [Training webpage](https://dpi.wi.gov/school-nutrition/training) as they become available (<https://dpi.wi.gov/school-nutrition/training>). The School Nutrition Team hosts several summer

training sessions across the state which can be beneficial. Be sure to track any training completed for professional standards credit.

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 paid-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 paid/normal status in 10 calendar days. Change the affected students' benefit to paid/normal in the software system on the 10th calendar day from the date the letter was sent. Submit a copy of the letter as proof of corrective action. *Corrected on-site; no further action required.*

- ❑ **Finding B:** The application denial letter does not contain the reason for denial, as is required by USDA.

Correction Action: Please revise the application denial letters so that they contain the missing information stipulated above. Submit a copy of the revised letter.

Verification

Technical Assistance:

Error Prone

- An application is considered “error prone” if the reported income is within \$100 per month or \$1200 per year of the applicable income eligibility guidelines. While all applications submitted have the potential to contain errors, the term “error prone” is only used to describe applications within the income range described above.
- Please note that the standard sample size for verification requires that applications selected for verification be chosen from error prone applications approved as of October 1. On the verification collection report, the SFA reported that standard sample was used but the verified applications were not error-prone--alternate one sample was actually used. See corrective action below.

Official Roles

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

Findings and Corrective Action Needed: Verification

- ❑ **Finding C:** The verification collection report (VCR) contained an error. The sample selected was “standard sample,” but alternate one was actually used.

Corrective Action: The VCR must be unlocked by DPI before the SFA can make edits. The consultant will notify the SFA when the report has been unlocked and is available for editing. Once the report is unlocked, correct and resubmit the VCR. Notify the consultant when the corrected report has been submitted.

- ❑ **Finding D:** The application selected for verification did not contain the signature of the verifying official in the designated section upon completion of verification. Additionally, all applications were signed by the confirming official in the designated section on the back of the application. The confirming official section should only be signed after completion of a confirmation review on applications selected for verification.

Corrective Action: Submit a statement of understanding of the confirmation review process for verification. Please also affirm understanding that verified applications must be signed and dated by the verifying official.

Meal Counting and Claiming

Commendations:

- The claims for reimbursement appeared accurate. Appropriate edit checks were used for claim submission. Data available supporting the annual claim for the Wisconsin School Day Milk Program appeared accurate and thorough.

Technical Assistance:

Visiting Students

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

Field Trip Meals

- Field trip meals are only offered in the SFA on a "last resort" basis if a student forgets their lunch or otherwise does not have a meal on field trip days. Food service does not actively offer field trip meals. If field trip meals will be more widely offered in the future, a corresponding standard operating procedure must be added to the food safety plan and proper point of service (POS) practices would need to be implemented. Field trip POS must involve a formal procedure in which teachers verify that eligible students received a reimbursable meal. DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student field trip meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Thank you to the food service director, school nutrition professionals, and staff at Shiocton School District. The time and efforts spent preparing for and participating in the onsite review were much appreciated. All documentation submitted for the week of review was thorough and organized. The food service staff has many commendable practices in place, including implementing a flavor station, using condiment signage to remind students to take only one squeeze of the condiments,

and hanging signage in the serving line telling students how many carrots to select for their ½ cup vegetable.

- Additionally, it is great that the food service staff holds daily pre-service meetings to go over the planned meals for the day. The staff's dedication to the program shows in the perfect week of review for both breakfast and lunch. Thank you for all that you do for the students of Shiocton School District!

Technical Assistance:

Co-mingling Flexibility for 4K Students

- Pre-K students are allowed to be served the K-8 menu at lunch or K-12 menu at breakfast instead of the Child and Adult Care Food Program (CACFP) meal pattern if they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA.
- Currently, the 4K students are co-mingled at breakfast, but are served the CACFP meal pattern at lunch. 4K students go through the lunch serving line first, followed by the kindergarten (5K) students. On some days, these two groups of students overlap, creating a challenge for food service staff to switch between the two meal patterns. Based on this overlap, using the co-mingling flexibility would be an allowable option for lunch service. All students in 4K through 8th grade may be offered the K-8 meal pattern at lunch.

Standardized Recipes

- The standardized recipes submitted for the week of review were overall thorough and specific to the site. A few items should be corrected or clarified to ensure these items are always prepared and credited as intended.
 - The meat/meat alternate crediting on the Croissant Breakfast Sandwich should be updated to 1.5 oz eq.
 - The utensils used for the yogurt and strawberries in Strawberry Parfait recipe differ from the actual amounts called for. For example, a #16 scoop is listed by the strawberries, but the recipe actually calls for ½ cup of strawberries.
 - The crediting on the Turkey Sandwich on Whole Grain Bread recipe should be updated to reflect the total amount of turkey, which credits as 2 oz eq meat/meat alternate.
 - The instructions on the Grab n Go Salad recipe should be updated to match the ingredients currently in use. Any steps involving ingredients that are no longer used should be removed.
 - The Grab n Go Salad is offered with an additional grain item, either a dinner roll or crackers, which is included on the standardized recipe. It is encouraged to record the specific grain offered with the salad on the production record each time it is on the menu. This will ensure that there is a complete record of all items offered to students.
 - The total amounts of the turkey and ham to be included on the Loaded Boardwalk Sub should be clarified on the standardized recipe to ensure that the sub credits as intended. Consider only including the total weight of each meat variety since the individual slices are not always a consistent weight.
 - The whole grain-rich bun is included on the Loaded Boardwalk Sub recipe and therefore does not need to be included on the production record.
- Not all ingredients need both a weight and measure on the standardized recipe. For example, the strawberries used in the Strawberry Parfait could include only the ½ cup as the measure and would not need a corresponding weight. The granola could list the volume measurement (in cups), the corresponding weight (in ounces), or both, depending on how this ingredient is actually portioned out during production.

Production Records

- Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes.

- The number of servings and quantity prepared for the fruit offered at breakfast on Wednesday during the week of review was not recorded on the production record. Additionally, the amount leftover was not recorded for all menu item offered with this meal.
- The number of actual meals served and milk usage were not recorded on the breakfast production record on Friday during the week of review.
- All other production records submitted for the week of review were complete and clear.

Peanut Butter Sandwich

- The peanut butter sandwich offered on some days as an alternate entree option is made with four tablespoons of peanut butter in order to credit as 2 oz eq M/MA. Since peanut butter can be a source of significant calories and fat, consider reducing the amount of peanut butter to two tablespoons. The sandwich may then be offered with an additional item that credits as 1 oz eq M/MA, such as a cheese stick or 4 oz yogurt cup. These additional items could be limited to only students selecting the peanut butter sandwich entree.

Vegetable Crediting During the Week of Review

- Mixed vegetables may credit toward their respective subgroups when the percent of each subgroup is known. The USDA fact sheet for the Mixed Vegetables offered during the week of review provides this information, allowing the mix to be credited toward the red/orange, starchy, and other subgroups.
- The serving size of the pork taco filling offered with the Walking Nachos entree during the week of review does not contain a creditable amount of red/orange vegetable. This did not result in total vegetable or subgroup quantity shortages during the week of review. The production records should be updated to reflect this.

Offer versus Serve (OVS)

- Consider incorporating the [Breakfast OVS Handout](#) or the [Meal or No Meal PowerPoint](#) presentation into the daily meetings or staff training as additional practice with OVS (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx>).

Printed Monthly Menu

- Both the printed breakfast and lunch monthly menus include a reminder that students must select at least ½ cup fruit or juice as part of a reimbursable meal. The lunch menu should be changed to remind students to select at least ½ cup fruit or *vegetable*.
- The shortened non-discrimination statement on the menu should be updated to *This institution is an equal opportunity provider*. This was corrected during the onsite review.

Social Media

- It is encouraged to share photos of meals, decorations, and events with the DPI School Nutrition Team for posting on our 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

- ✓ There are no findings or corrective actions needed for the Meal Pattern and Nutritional Quality section of this Administrative Review.

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

- 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 excess cash balance. A letter from DPI in the spring will formally advise the SFA on the necessity of spending down the excess balance. 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.

Allowable Costs

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

[Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- The SFA's unpaid meal charge policy was well written and detailed. The content clearly communicates the progression of action taken when negative balances are accrued.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

☐ **Finding E:** The annual financial report (AFR) contained several errors.

- Revenues and expenditures were not allocated to the Wisconsin School Day Milk Program
- Expenditures were not allocated to non-program foods.

Note: when allocating expenditures per program, expenditures should be allocated into each appropriate category including labor, food, equipment, purchased services, and other.

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 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:

Food Purchased for Other Organizations

- The food service director occasionally purchases and prepares food for school organizations/functions. These food items are not purchased through Fund 50. The organization responsible pays the invoices for the food directly to the vendor. In these scenarios, food service staff paid through Fund 50 may be using work time to fill these orders which are for non-program purposes. It is important to consider how these labor costs could be reimbursed to Fund 50 in the future, particularly if significant amounts of labor are dedicated to these orders.

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>).

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

Findings and Corrective Action Needed: Non-Program Foods Revenue

- ❑ **Finding F:** The [Non-program Foods Revenue Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) has not been completed for the current school year to assess compliance with the revenue requirements (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>). The food service director did complete the tool for the school year 2017-18, but it was not completed correctly.

Corrective Action: Complete and submit a completed tool using at least a 5-day reference period. After tool completion and submission, the SFA and consultant must collaborate on any suggested changes to non-program food procedures and pricing to ensure compliance, if the completed tool indicates non-compliance with requirements. The SFA must develop a plan to meet non-program food revenue requirements if the completed tool indicates non-compliance.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

Civil Rights Compliance Self-Evaluation Form (PI-1441)

- The SFA did not complete the PI-1441 prior to the review. This evaluation form should be completed by October 31 annually. This evaluation does not get submitted to DPI, but should be retained at the SFA for self-evaluation purposes and for future reviews.

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 5 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

- While the SFA is not currently accommodating any special dietary needs, it is important to note and become familiar with the pertinent regulations for possible accommodations in the future. Per district procedures, special dietary requests would begin between parents and the school nurse.
- 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 ([10](http://dpi.wi.gov/school-</div><div data-bbox=)

nutrition/national-school-lunch-program/special-dietary-needs). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>).

- If accommodations will be made in the future based on signed medical statements, the food service director should receive and retain copies of the signed statements submitted by the household. It is crucial that the food service director be able to easily access the exact accommodation request so that it can be implemented correctly and safely according to the medical practitioner's directions.
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice or water may not be substituted for fluid milk unless juice or water is specified as a substitution on a medical statement signed by a licensed medical practitioner. An SFA may choose to offer lactose-free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA without a medical statement. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- 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 G: The Civil Rights Self-Compliance PI-1441 form was not completed for the 17-18 school year. This form must be completed annually by October 31st and retained by the SFA.

Corrective Action: Complete the [PI-1441 form](#) for the current school year. Submit copy of completed form to the consultant. Provide a statement describing how this form will be completed by the deadline annually, including a designation of which person will be responsible for completion.

On-site Monitoring

Technical Assistance:

- While the SFA operates two school sites according to the online contract, all school sites are located in the same building. The food service director has direct daily oversight for all sites and therefore on-site monitoring is not required. The director may choose to complete the on-site monitoring forms as desired if it will help maintain program oversight.

Local Wellness Policy (LWP)

Commendations:

- The SFA clearly values the wellness of students, staff, families, and community members. The wellness documentation reviewed on-site contained very detailed, organized information about wellness committee meetings, goals, policy implementation, and district-wide wellness initiatives.

Keep up the good work promoting wellness in the district and surrounding community, as well as documenting wellness committee meetings and initiatives!

Technical Assistance:

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 policy (LWP) requirements. 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).

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.

- Shiocton School District completed a policy assessment using the LWP report card in 2015-16. It was unclear if the results were made publicly available at that time. The SFA is on track to complete an assessment during the current school year as well and technical assistance was provided regarding the requirement to make the assessment results publicly available.

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.

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding H:** The local wellness policy (LWP) does not contain required language pertaining to public involvement, or updating/informing the public. Additionally, the content areas pertaining to school meals, food sold outside the meal program, food provided but not sold, nutrition promotion, physical activity, and the triennial assessment are outdated, lacking detail, or do not reflect current practices in the district. Further, it is recommended to remove language referencing the US Government's Nutrition Standards and "district nutrition standards," and instead specifically reference the regulations in the *Healthy Hunger-Free Kids Act* and *Smart Snacks*, when applicable.

Correction Action: Submit a timeline for updating the policy to become compliant with the final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule.

Smart Snacks in Schools

Technical Assistance:

- The Smart Snacks Final Rule finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. More information can be found on the [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- All fundraisers within the district are being tracked appropriately and the state-defined limits on exempt fundraisers are being followed.

Findings and Corrective Action Needed: Smart Snacks

- ✓ **Finding I:** The Vita Ice and Propel beverages sold a la carte are not Smart Snacks compliant for middle school 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](#) for the allowable beverages and corresponding serving size restrictions (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf>).

Corrective Action: This was corrected onsite by removing the unallowable beverages from the middle school a la carte section and educating students and staff on this change. *Corrected on-site; no further action required.*

Professional Standards

Commendations:

- The food service director has daily meetings with food service staff and holds trainings throughout the year to train and refresh on various topics. Great job providing ongoing training for the team!

Technical Assistance:

Training Requirements

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

Student Worker Training

- There is one student worker that assists in the morning in the cafeteria as part of a class. This student receives class credit as an incentive and is not paid or given a meal as an incentive. This student has received basic food safety and job-specific training, however this training has not been tracked. While this student is not subject to professional standards requirements due to limited duties in the cafeteria, it is still recommended to record the training provided to the student worker.

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.

Findings and Corrective Action Needed: Professional Standards

- ❑ **Finding J:** The business manager responsible for claim submission, financial management, and verification activities is considered a "part-time non-nutrition staff with duties related to nutrition programs," thus they are subject to the four hour professional standards training requirement annually. [Civil rights training](#) also must be completed by the business manager due to the level of Child Nutrition Program involvement (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>). The business manager has not completed civil rights training and has not tracked any professional standards hours.

Corrective Action: Submit a training tracker for the business manager to reflect training hours completed during the current school year. Please complete and track civil rights training on the tracker prior to submission. The [DPI training tracker](#) can be used if desired (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>).

- ❑ **Finding K:** The professional standards tracking tool utilized by the food service director does not contain all of the required information. The tool is missing the following information: date hired, title/position, brief list of responsibilities, employment status (full-time vs part-time), and professional standards position (director, manager or staff).

Corrective Action: Update the tracking tool to contain all required information and submit modified tool to consultant.

Food Safety

Commendations:

- The kitchen and storage areas were clean and organized. Good food safety practices were observed during preparation and service. The food service director and staff complete annual training on the food safety plan, standard operating procedures, and go over food safety inspections as a group. It was clear that food safety is a priority in Shiocton School District.

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.

Food Storage

- In the freezer, boxes of food were observed on the floor. In the cooler, full crates of half pints of milk were stored on the floor. Due to a recent delivery, the boxes of the freezer were temporarily on the floor and in the process of reorganization. The full milk crates are always stored directly on the floor, and have not been cited on food safety inspections. It is advisable to store full milk crates on top of empty crates to get them off of the floor at least six inches. Wisconsin Food Code requires that food be stored at least six inches off of the floor. It is strongly recommended to consult the local sanitarian regarding the acceptability of storing full milk crates on the floor.
-

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 which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](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 L:** The following products were identified in the SFA’s storage area as non-domestic and not documented:
 - Trio Poultry Gravy (Canada)
 - Dole Mixed Fruit Cup (Thailand)

Corrective Action: Complete and submit a Non-Compliant Product Form for the products listed above. *Corrected on-site; no further action required.*

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 Shiocton 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

Findings and Corrective Action Needed: SFSP Outreach

- Finding M:** 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.

Wisconsin School Day Milk Program (WSDMP)

Commendations:

- The WSDMP is running very well at Shiocton! All program requirements are being met, including acceptable point of service (POS) practices in the classrooms. In the three classrooms observed, teachers took care to check off students in the software system only after each child received their milk thus constituting a reliable POS. Utilizing the software system to count and track milk served appears to be highly effective.

Technical Assistance:

Special Milk Program (SMP) Option

- The half-day early childhood children currently participating in WSDMP are eligible to participate in SMP. SMP is a federally funded milk program that provides reimbursement for milk served to children not participating and claimed in other federal nutrition programs (such as NSLP and SBP).
- SMP could be added in place of WSDMP for these half-day early childhood children in the future. The non-pricing SMP option would allow all participating early childhood students to receive free milk. Under this plan, all milks served are reimbursed at the paid rate established by USDA. If early

childhood students have access to breakfast or lunch in the future, then they would not be eligible for SMP. Please reference the [Milk Programs webpage](https://dpi.wi.gov/school-nutrition/milk-programs) for details (https://dpi.wi.gov/school-nutrition/milk-programs).

- If the SFA wishes to add SMP in the future, this can be done through modification of the online contract with DPI.

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.

Findings and Corrective Action Needed: WSDMP

- ❑ **Finding N:** The Wisconsin School Day Milk Program agreement on file with DPI is from 1990 and does not reflect current practices for the program in the SFA.

Corrective Action: Complete and submit an updated [agreement](https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf) to the consultant for approval (https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf).

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).

