

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Washburn School District

Agency Code: 46027

School(s) Reviewed: Washburn Middle School

Review Date(s): November 13-15, 2017

Date of Exit Conference: 11/15/17

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation:

Thank you to the staff at Washburn School District (46027) for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information when requested. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Thank you to the Determining Official (DO) for being available to answer questions, clarify information and follow-up with households when necessary.

144 of 192 eligibility determinations were reviewed. The following errors were identified:

- 6 applications with a total of 11 students did not complete the household number and social security boxes or had a discrepancy between the household number and the number of individuals listed on the application.
- 2 applications with a total of 6 students had benefits incorrectly determined.
- 6 applications with a total of 12 students were provided 30 days before the current year benefit determination went into effect. This delay is not in accordance with regulations and guidelines for processing applications outlined in the [USDA Eligibility Manual for School Meals](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Technical assistance was provided on correct processing of the applications and Corrective Action is requested below to address this Finding. The following Technical Assistance is provided includes information discussed during the on-site visit.

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within **10 operating days** of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official (DO), except when the SFA has been approved to use the *Effective Date of Eligibility Flexibility* noted below and described in SP 11-2014.
- All free/reduced applications and the direct certification runs were available for review.

Effective Date of Eligibility

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

Annual Income

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

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and **must** match the number of names on the application for the application to be considered complete. The SFA should follow up with households immediately to complete this box or correct a discrepancy between the number and household members outlined on the application.

Incomplete Applications

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

Application Forms

- Thank you for using the DPI prototype letters with the current non-discrimination statement.
- The SFA is reminded that the full and current non-discrimination statement must be used on all communications regarding USDA Child Nutrition Programs, even non-required letters such as reminders to submit applications prior to the carryover date. As a reminder, the DPI SNT has created an [Expiring Benefits](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expiring-benefits-template-letter-1718.doc) template letter for SFAs to utilize (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expiring-benefits-template-letter-1718.doc).

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Direct Certification

- As a reminder, School Food Authorities (SFAs) are required to run Direct Certification (DC) a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- At the time of the review (November), the SFA has completed two DC matches in the required time frames.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- The SFA is strongly encouraged to send DC notification letters to households prior to the start of the school year. This will help to limit the number of applications being returned from already qualified families. Additionally, the district is not required to provide applications to households that already qualify for meal benefits for the year via DC.
- The SFA is encouraged to work with Skyward to determine how to upload the DC list to the software system to improve efficiency of benefit distribution. The SFA's current process is to manually update each individual benefit status in the system.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year.
- Washburn School District had a 20.14% SFA-1 certification error rate and will be required to conduct a second review of applications in the following school year. More information on this requirement is found in the Eligibility Manual. You will also receive a SNT memo in summer 2018 with more information.

Disclosure

- The information provided by families on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the Disclosure Agreement form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Required: Certification and Benefit Issuance

❑ Finding #1: 18 certification and benefits issuance errors were identified that are to be included for fiscal action calculations. These errors are outlined on the SFA-1 form provided on-site.

Corrective Action Required: Please follow up with the students/households in error noted on the SFA-1 form. Record dates benefits were corrected on each form and submit to DPI. Please note, timely correction of applications is encouraged to limit fiscal action.

❑ **Finding #2:** 12 application errors noted on SFA-1 were related to an incorrect benefit distribution date. As noted in the Eligibility Manual for School Meals on page 46, the carryover period is not intended to delay processing of applications. Instead, SFAs must process applications as they are received and promptly notify households of their eligibility status. Within 10 days of receiving an application, the SFA must make a determination and notify the household of its eligibility status. The DPI SNT has multiple webcasts on the application determination process, including:

- [Getting Started in Free/Reduced Price Meal Eligibility](#)
- [Processing Applications and Direct Certification in Free/Reduced Price Meal Eligibility](#)
- [Special Situations in the Free and Reduced Price Meal Eligibility Process](#)

Corrective Action Required: Review, at a minimum, Sections 1-3 of the [Eligibility Manual for School Meals](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>). Submit a statement noting completion of this review as well as the amount of time taken to complete. Please note, this time can be credited towards Professional Standards Continuing Education Training Hours, which are further described later in the report. Please include a statement detailing the SFA's understanding of the correct expiration date of carryover benefits and an understanding that new applications and Direct Certification qualifications supersede previous eligibilities. Additionally, if the SFA would like to use the *Effective Date of Eligibility Flexibility* noted above and described in SP 11-2014, please submit the appropriate documentation to Karrie Isaacson (karrie.isaacson@dpi.wi.gov) and provide a copy of the communication as part of Corrective Action.

Verification

- When applications are chosen for verification, the person designated as the Confirming Official (CO) must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the CO to sign and date on the back of the application. The CO only needs to review, confirm, and sign those applications selected for verification.
- Subsequently, the Verification Official (VO) only needs to sign those applications that have been reviewed and verified as part of the verification process.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current [Eligibility Manual](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- The SFA is encouraged to work with Skyward to determine if it is possible to pull data used in the Verification Collection Report (VCR) from the operating system.

Findings and Corrective Action Required: Verification

❑ **Finding #3:** Two applications were selected for verification. Both were determined by the SFA to have no change in meal status. Review by DPI indicated one application should have changed to paid meal status. The application was noted in error on the SFA-1. The second application did not provide documentation for all sources of income listed on the application. As the second application was not part of the 144 eligibility determinations reviewed, it was noted in error on the SFA-2.

Corrective Action Required: Send notification of the benefit change to the household changing to paid meal status. Provide 10 calendar days before changing the meal benefit to allow the household time to deposit funds into the family account. Note the date the letter was mailed home on the SFA-1 for coded students N1, N2, N3, N4. Request all required documentation from the household that failed to submit documentation for all forms of income noted on the application. Complete the verification review process and noted the date the letter was mailed home informing the household of the outcome on the SFA-2. Update and report outcomes, as well as section 5-4, on the Verification Collection Report (VCR).

❑ **Finding #4:** While the Confirming Official (CO) signed the back of the applications selected for verification, no confirmation review was truly completed. The CO should review applications selected for verification prior to contacting the family, confirming the original benefit determined was correct. If the original benefit is incorrect, the SFA should follow guidelines outlined in the Eligibility Manual for School Meals. If correct, the SFA should proceed with contacting the family for verification documentation.

Corrective Action Required: Please review the role and duties of the CO in the Eligibility Manual for School Meals. Please provide a statement detailing the CO duties and the SFA's intended compliance for verification in the future.

Meal Counting and Claiming

- All components must be made available before the Point of Service (POS) for both breakfast and lunch. An adult must be monitoring all meals for both breakfast and lunch to both ensure the meal is reimbursable and the student pin entered matches the student receiving the meal.
- The SFA is reviewing the Skyward Accu-Claim Report (Edit Check, required) and running the Skyward Audit Report (best practice) prior to submitting the monthly claim for reimbursement. While the SFA correctly used figures from the Accu-Claims for the October 2017 Claims for Reimbursement, meals were noted on the Audit Report, of which a portion were linked to students using pin numbers from students that have left the district or graduated. The SFA is commended for reviewing the Audit Report but is strongly encouraged to review SFA processes to attain zero on the monthly Audit Report.
- The SFA is strongly encouraged to work with Skyward to ensure only active student pin numbers can be used. Graduated and other students that have left the district should not be pulled into any reports for meal counting and claiming.

Findings and Corrective Action Required: Meal Counting and Claiming

❑ **Finding #5:** While no non-reimbursable meals were observed at breakfast, the milk dispenser was after the Point of Service (POS). All components must be made available prior to the POS. Additionally, staff monitoring the POS at breakfast should stop when students are entering their pin number to both review the meal for reimbursement **and** confirm the account charged matches the student selecting the reimbursable meal.

Corrective Action Required: Please submit a summary and/or photo detailing how all components have been made available to students prior to the POS at breakfast.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Thank you to all staff at Washburn School District for the warm welcome and cooperation during this Administrative Review. Staff at Washburn Middle School are doing a wonderful job preparing scratch-cooked meals to students. They have healthy options to choose from including a daily salad bar filled with numerous, fresh vegetable offerings. Menu items were pleasantly displayed using baskets, colorful tablecloths, and pictures for a presentable, enjoyable experience. Washburn School District is doing a commendable job with Farm to School, as they have school gardens for hands-on learning and even use some of the produce in the lunch program! Great job promoting healthy eating and sustainable agriculture.

Crediting

Many recipes and menu items during the week of review contained incorrect crediting for the 6-8 meal pattern.

- Oriental Chicken Recipe
 - o No crediting provided
 - o Actual crediting: $\frac{1}{4}$ cup = 1.75 oz. eq. M/MA (40 pounds \times 16 ounces per pound = 640 ounces \div 337 servings = 1.89 oz. eq., rounded down to the nearest quarter ounce = 1.75 oz. eq. M/MA)
- Alfredo Sauce with Chicken Recipe
 - o Crediting on recipe: $\frac{3}{4}$ cup = 2 oz. eq. M/MA
 - o Actual crediting: $\frac{3}{4}$ cup = 1.75 oz. eq. M/MA
- Ham Stacker Sandwich
 - o No crediting provided
 - o Actual crediting: 1 sandwich = 2 oz. eq. M/MA and 2 oz. eq. Grain
- Chicken on a Stick
 - o Crediting on production record: 2 ounce portion = 1 oz. eq. M/MA
 - o Actual crediting: 2 ounce portion = 1.25 oz. eq. M/MA
- Pasta, Whole Grain
 - o Crediting on production record: $\frac{3}{4}$ cup = 1 oz. eq. grain
 - o Actual crediting: $\frac{3}{4}$ cup = 1.5 oz. eq. grain

In-house Yield Study

During the Administrative review, the school was consistently serving a specific fruit size not currently listed in the Food Buying Guide (FBG) (e.g. 72 count oranges, 80 count apples). The fruit being offered consistently has a higher yield compared to the fruit listed in the FBG. The Wisconsin Department of Public Instruction – School Nutrition Team (DPI-SNT) allows the use of in-house yield data for crediting food items contributing to meal pattern requirements. As part of the in-house yield study, the Food Service Director must maintain original documentation showing the method and procedures used to determine yield. Visit our website for [in-house yield study procedures](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) and a documentation template (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes and they are useful tools to record information prior to production, during production, and following production. The production record template currently in use is out of date and uses language that is not currently applicable (e.g. Free Seconds). Furthermore, there is missing information, such as number of meals planned, number of meals served, total number of purchase units prepared, planned portion size (milk) and actual usage for condiments and any extra menu items. While there is no required production record template, there are some breakfast, lunch, and salad bar examples that may be used 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>). Templates can be edited and adjusted for your operation. A copy of the production record requirements (“Must haves and Nice to haves” list) can also be found at that link.

Be specific on production records about the identity, brand, and description of the items served. Production records should indicate exactly what was served. Fruit sizes (e.g. case count) should also be recorded for apples, oranges and pears as the FBG contains different crediting for various sizes. It is helpful to include not just portion size, but also crediting, on production records.

Standardized Recipes

Standardized recipes for lunch show three different grade groupings (e.g. grades 4K-6, 7-8, 9-12). Remember that each of these grade groups may require different serving sizes to meet their unique meal pattern requirements. Please note, 4k-6 and 7-8 are not recognized grade groupings. Also, 4k and those children not yet in kindergarten are now required to follow the updated CACFP meal pattern (more information on the CACFP meal pattern is listed below). USDA has three options to combine age/grade groups for lunch, which include K-5, 6-8, and 9-12. Review meal pattern tables on our [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables) website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables>).

Additionally, a few recipes used during the review week lacked pieces of information required for standardized recipes. Technical assistance was given on-site to analyze each serving of the recipe. This is needed for menu planning to ensure that the portions offered are actually what is intended. Please use our [recipe tools and resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) to aid in this process (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). There is a checklist of information necessary to standardize a recipe, calculators to assist with nutrient analyses, and a template to help organize the information. The recipe standardization process will take several times producing the menu item to make sure it comes out the same way. This requires organized record keeping throughout the process.

Documentation

As a reminder, a Child Nutrition (CN) label or Product Formulation Statement (PFS) is required for any combination food or Meat/Meat Alternate (M/MA) or other processed food not found in the USDA Food Buying Guide (FBG) for School Nutrition Programs. Please keep updated copies of CN labels on file. It is important that CN labels are taken directly from the box. They can be kept in original format or photocopied as a clear, legible photocopy with the entire label visible. When CN labels are not available for products, those products must have a current, accurate PFS detailing product composition and crediting information in order to be served.

Record Milk

Milk is a required component as part of the National School Lunch Program and School Breakfast Program. You must record planned portion size and daily usage by milk type on your production records at both breakfast and lunch.

Record Condiments

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Technical assistance was provided on serving peanut butter and other condiments this way. It is not recommended to leave this item at an unmonitored station. Condiment usage is not monitored nor are portion sizes communicated to students. Please monitor your school's condiment usage and communicate appropriate portion sizes to students.

Consider promoting correct serving sizes by adding signage at the condiment station with a photo of what one tablespoon of salad dressing looks like, using signage such as "One squeeze, please!" on self-serve squirt bottles or purchasing single-use one-ounce cups to aid in portion control. More information on sodium targets is found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage, under the Sodium heading (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). The optional "Weekly Nutrient Calculator" tool to help monitor compliance with sodium targets is also found on this webpage, under the Menu Planning Tools heading.

Breakfast Participation

During the Administrative Review the Food Service Director indicated that breakfast participation numbers dropped drastically in the past year. The FSD noted that breakfast service fell from serving approximately 300 students per day to approximately 15 students per day. She believes the drastic fall in participation is due to the removal of the Breakfast in the Classroom program.

The [Serving Up a Successful Breakfast Program Toolkit](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf) contains information on how to improve participation in an existing program (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf>). Successful meal service requires student satisfaction, a positive meal image, and a supportive environment. Participation in the School Breakfast Program is important – primarily as a way to help meet the nutritional needs of students, but also to help schools receive maximum reimbursement and run a successful program. This resource includes information on the different service models with tips on how to implement them in your school. In addition, it provides many marketing and promotion ideas that include videos, letters and inserts to send home with students.

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

Menu Planning Tools

Menu Planning Worksheets are a helpful tool for ensuring that meal pattern requirements are met at both breakfast and lunch (particularly vegetable subgroup requirements). These can be found electronically on our website under [Menu Planning Worksheets](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning). There is also a [Recipe Crediting Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/recipe-crediting-tool.xls) for calculating ounce equivalents of meat/meat alternate, ounce equivalents of grain, cups of fruit, and cups of vegetable per portion of a recipe (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/recipe-crediting-tool.xls).

Training

It is recommended that anyone involved with the school meals program attend DPI training classes. The classes are offered in the summer and select other times throughout the year. Numerous webcasts are also available. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the NSLP and SBP requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Information on upcoming trainings can be found on DPI's [Training](https://dpi.wi.gov/school-nutrition/training#up) Page (https://dpi.wi.gov/school-nutrition/training#up).

Coffee Cart

Coffee and espresso drinks are all allowable beverages at the high school level. Ensure products are offered in acceptable portion sizes to be compliant with the Smart Snacks standards. Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar needs to be added together when determining if the beverage meets the guidelines below.

Beverage Guidelines:

- Calorie-free beverages (for black coffee only)
 - <5 calories per 8 fl. oz; ≤10 calories per 20 fl. oz
 - Maximum serving size: 20 fl. Oz

- Lower-calorie beverages (for coffee with cream and/or sugar)
 - ≤40 calories per 8 fl. oz; ≤60 calories per 12 fl. oz
 - Maximum serving size: 12 fl. oz

To help determine if coffee drinks are compliant, utilize the [Alliance for a Healthier Generation's Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) (https://foodplanner.healthiergeneration.org/calculator/). If they are, you will be able to print a reference sheet showing compliance directly from the website as record keeping documentation. DPI's [Smart Snacks In a Nutshell](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) with food and beverage requirements can be found on our website (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf).

Milk Signage

Milk is currently served in bulk from a dispenser using 10 fluid ounce cups. So that students know that a full component of milk is 8 fluid ounces, consider adding signage with a picture and/or explanation of what a full 8 fluid ounces looks like.

Child and Adult Care Food Program (CACFP)

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten, including 4K students. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the Infants and Preschool in NSLP and SBP webpage.

Extras and Dietary Specifications

Extra, non-creditable items such as fortune cookies, chow mein noodles, and various high-calorie and/or high-sodium condiments are offered on the menu. These foods do not credit toward the meal pattern, but must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While occasional use of such foods is allowable and can be a nice incentive for participation, they contribute toward your calorie, saturated fat, and sodium limits without being able to fulfill any of the required components. It can be very difficult to stay within the dietary specification limits if extras are constantly offered. These foods are also adding to the cost of the meal without providing the value of being a creditable component for a reimbursable meal.

TA was provided on-site for the foods offered either during the week of review or day of on-site observations that specifically impact dietary specifications. Major contributors of sodium include condiments (e.g. soy sauce), regular canned vegetables, deli meats, dairy products, cheese, olives, and processed food items. The cheddarwurst served alone contains 900mg sodium and the chicken tenders contain 610 mg sodium per serving. It is recommended to purchase products that are labeled reduced-sodium, low-sodium, or no salt added. In addition, the use of portion control cups and/or serving utensils is highly recommended specifically for condiments on the self-serve condiment table. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years.

Foods that can be major contributors of calories and saturated fat include fatty meats and/or meat with the skin on (e.g., Tyson Chicken on a stick) and full-fat dairy products (e.g., heavy whipping cream used in Alfredo sauce, butter in recipes and on the condiment table). It is recommended to serve lean meat products without the skin and to limit the use of full-fat dairy products. Switching to reduced-fat, low-fat or skim dairy products will reduce the calories and saturated fat of the recipe.

Additionally, the self-serve condiments at breakfast (peanut butter, Nutella, jam/jellies, and butter) will contribute towards the dietary specifications. Consider adding signage such as "limit one" for portion control measures.

Whole Grain-Rich Exemption

If the SFA can demonstrate a hardship in procuring, preparing or serving a compliant WGR product that is accepted by students, an exemption can be requested for that specific product. Review the August 23, 2017 memo, "[School Meal Flexibilities for School Year \(SY\) 2017-18](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf)" for more information on the exemption process (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf>). The Food Service Director completed an exemption request, which is currently pending. Note that until an exemption approval has been received, WGR products must continue to be served.

Findings and Corrective Action Required: Meal Pattern and Nutritional Quality

Finding #6: Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning 50% or more of the product needs to be whole grain. When determining if an item is whole grain-rich, the first word in the ingredient list needs to say whole or have a whole grain listed first. The Rice Pilaf, Mexican Rice, and Chicken Tenders served during the week of review were not whole grain-rich. If making from scratch, consider a 50/50 blend of whole grain and non-whole grain products for student acceptability.

Corrective Action Required: Find new, whole grain-rich versions of the following products and submit nutrition facts labels, ingredient lists and recipes if applicable:

1. Rice Pilaf
2. Mexican Rice
3. Chicken Tenders

Finding #7: No crediting documentation was provided for the Chicken Tenders served 10/16/17 to determine the Meat/Meat Alternate or Grain crediting. Because of the missing documentation, the daily and weekly Meat/Meat Alternate and Grain quantities could not be determined. This is considered a daily and weekly shortage for Meat/Meat Alternate and Grain during the week of review.

Corrective Action Required: Please submit crediting documentation (i.e. CN Label or Product Formulation Statement, if applicable, and a Nutrition Facts Label) showing the meal pattern contribution for the Chicken Tenders, served 10/16/17. If documentation received shows a daily and weekly shortage for Meat/Meat Alternate and/or Grain, I will request a written statement explaining what you will do to correct these shortages.

Finding #8: Production Records were missing information, including planned number of portions and total planned quantity (in purchase units). The production record template in use does not include columns for this information. Consider using DPI's editable production records templates, found under the Production Records heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). Additionally, anything offered as part of a reimbursable meal needs to be recorded on production records. Currently, condiment usage is not recorded for breakfast or lunch.

Corrective Action Required: Please send a week of completed production records for both breakfast and lunch showing all items offered as part of a reimbursable meal were recorded, including condiments. The planned number of portions and total planned quantities (in purchase units) need to be filled out as well.

3. RESOURCE MANAGEMENT

Annual Financial Report (AFR):

All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. This will aid the school in calculating its annual nonprogram foods compliance. The new SY16-17 [Annual Financial Report \(AFR\) instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the [DPI SNT Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>; <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

As a reminder, the [Child Nutrition Program Report](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/instructions-accessing-child-nutrition-program-report.pdf) provides a compilation of meals claimed, reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/instructions-accessing-child-nutrition-program-report.pdf>). The Child Nutrition Program Report is accessible from the DPI SNT [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).

Findings and Corrective Action Required: Annual Financial Report

❑ Finding #9: The Annual Financial Report (AFR) did not separate adult meals from the National School Lunch Program (NSLP) and School Breakfast Program (SBP) reporting categories. Adult meals are now required to be reported in the Nonprogram Foods category. Additionally, expenses and reviews associated with paid Wisconsin School Day Milk Program (WSDMP) students must be reported in the Nonprogram Foods category, as these students are not claimed in the WSDMP. Lastly, any food purchases that are ordered through food service must be paid back to food service as a nonprogram food revenue with an appropriate mark-up. If organizations outside of food service would like to order food without a mark-up from food service, the organization should order through their own account. These purchases would not need to be run through the food service fund, Fund 50, as food service has not been involved with the ordering or receiving of the product.

Corrective Action Required: Update the SY 16-17 AFR to correctly separate and report adult meals and paid milks from the WSDMP. This will assist in updating the Nonprogram Food Revenue Tool, which has been requested as Corrective Action below.

Revenue from Nonprogram Foods

Nonprogram foods include adult meals, a la carte, extra entrees, extra milk (for cold lunch or milk break), vended meals (meals sold to other agencies), catered meals, and food service operated vending machines. All nonprogram food costs including food, labor, equipment, and purchased services **must** be covered by revenues received from the sale of these foods. Nonprogram foods may not be supported by reimbursable meals or have a loss absorbed by the food service account. Nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit. Nonprogram food costs and revenues must be separated from program food costs and revenues on the AFR to demonstrate compliance.

The [USDA Nonprogram Foods Revenue Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls) must be, at a minimum, completed yearly (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls). The [DPI Nonprogram Food Revenue Tool/Calculator](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-revenue-calculator.xls) aids in calculating prices of nonprogram foods to meet the [USDA nonprogram food regulation](https://www.fda.gov/food/food-safety-and-inspection-service) ([http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-revenue-calculator.xls)

program-food-price-calculator.xlsx; <https://www.fns.usda.gov/nonprofit-school-food-service-account-nonprogram-food-revenue-requirements>).

The [Nonprogram Foods In a “Nutshell”](#) provides a helpful overview of the nonprogram foods regulations (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>).

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

Adult Meals

Adult meals are considered nonprogram foods. Food service programs must price adult meals above the overall cost of the meals. The [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist SFAs in pricing adult meals. SFAs need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals.

The Washburn School District school nutrition contract was updated to correctly reflect the adult breakfast price charged in the district, which meets the requirements outlined in the Wisconsin Adult Meal Pricing Worksheet.

Findings and Corrective Action Required: Nonprogram Foods

❑ **Finding #10:** The [USDA Nonprogram Foods Revenue Tool](#) did not include all nonprogram foods in the district (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls).

Corrective Action Required: Update the USDA Nonprogram Foods Revenue Tool and submit an updated copy as corrective action.

Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). The SFA has a policy in place that all student fees, including unpaid meal charges, must be paid in order to ‘walk’ for graduation.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Nondiscrimination Statement

When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, SFAs are required to use the current statement which was updated in October 2015 (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

Civil Rights Training

Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of the school nutrition program. Civil rights training had been completed by all food service staff as evidenced by sign-in documentation. Other staff noted completion of the training but did not have sign-in documentation. The SFA is reminded that documentation should be maintained for all staff that have completed the annual civil rights training.

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 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the [DPI SNT Special Dietary Needs webpage](#). (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>)

School food service staff may make food substitutions, at their discretion, for children that do not have 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. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

Juice may not be substituted for fluid milk in the NSLP or SBP unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, SFAs must first notify the DPI SNT in writing and provide the nutrition information from the product to be served. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Processes for complaints

As a reminder, 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 Complain 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).

On-site Monitoring

Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1. The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo [SP 56-2016](http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf) (<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>).

The on-site monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on the [DPI SNT Reporting webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/reporting) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/reporting>). The SFA is reminded that a review of the NSLP at Washburn Elementary School must be completed before February 1, 2018.

Local Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. LWPs should include specific goals related to:

- Nutrition education: Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.
- Nutrition promotion: At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.
- Physical activity: Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.
- Guidelines for all foods and beverages *sold* on the school campus during the school day: The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks].
- Guidelines for all foods and beverages *provided* on the school campus during the school day: SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.
- Guidelines for food and beverage marketing: At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.
- Public involvement and committee leadership: SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.

- Implementation, assessment and update of policy: At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP.

Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

[Washburn School District](#) notified the public about its LWP through its website, (www.washburn.k12.wi.us). As a reminder, SFAs should review and update the LWP 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. SFA wellness committees should include a diverse team of committed school and community stakeholders, including parents and outside community members. The current wellness committee for the LWP does not include persons outside of the school district. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP. SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](#) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>).

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 (LWP) every three years, at a minimum. The first assessment should be completed within three years of your 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>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project have received a copy of a report comparing their policy to a model policy. Additional information about interpreting your schools report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (<https://www.wihealthatlas.org/lwp/>).

Findings and Corrective Action Required: Local Wellness Policy

❑ **Finding #11:** The Washburn School District LWP does not contain language for all the minimum required elements stipulated above, specifically guidelines for food and beverage marketing, language regarding the triennial assessment and language on the plan for updating and informing the public regarding the implementation, assessment and update of the LWP.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule. The [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) can assist with sample language (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>).

Smart Snacks

Smart Snack regulations govern all foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that is effective July 1, 2014. Information on Smart Snacks, along with a product calculator to help determine compliance of various food items, can be found on the DPI SNT [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage at (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Additionally, Smart Snacks govern food fundraisers held on the school campus during the school day, with the intent for the food sold to be consumed during the school day. The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

At the time of the on-site review, Washburn School District does not have any food fundraisers nor additional food items outside of the reimbursable meal for review.

Professional Standards

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, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

Directors: 12 hours

Managers: 10 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action Needed: Professional Standards

❑ Finding #12: Training, while being completed by staff, is not being documented by non-school nutrition staff with duties related to the school nutrition program.

Corrective Action Required: Submit a summary detailing how non-school nutrition staff with duties related to the school nutrition program will track continuing education training hours, specifically detailing the tracking mechanism to be used. Please outline the completed trainings completed in SY17-18 and the length of time. If the yearly training requirements of 4 hours have not been met, please provide a summary of potential trainings that will be completed to attain the yearly continuing education training requirement of 4 hours for non-school nutrition staff with duties related to the school nutrition program.

Food Safety and Buy American

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). Additionally, visit the [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators.

Food Safety Plan

All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan. The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site and should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.

A prototype food safety plan template as well as template SOPs may be found on the [DPI SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>). The Washburn School District Food Safety Plan was available for review.

Storage

The on-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The freezer was disheveled, with products on the floor and spilling out of boxes. This was discussed with staff at the school. The district noted that a new shipment had arrived and had not been fully put away yet. The SFA is reminded that food storage areas should be kept in order, working with a First-In, First-Out (FIFO) rotation. Items past their expiration date should be discarded and SFAs should only order food products, including USDA foods (commodities) that it can use in a timely manner.

Finding #14: The Standard Operating Procedures (SOP) for hair restraints and Process 3 foods, specifically taking temperatures during the cooling process, are not being followed. No hair restraints were worn during meal preparation or service. While no hair nets may be allowed by the local sanitarian for those with short hair, the SOP should be updated to reflect this practice. No cooling temperatures were being recorded for Process 3 foods. Additionally, the freezer was disheveled upon observation, with products on the floor and spilling out of boxes.

Corrective Action Required: Review these SOPs with your local sanitarian. Either update the SOP in the Food Safety Plan with the assistance of your local sanitarian or conduct a staff training on the current SOPs for hair restraints and cooling temperatures for Process 3 foods. Provide a copy of either the updated SOPs or note the changes that have been made to be in compliance with the current SOPs.

Buy American Provision

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

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

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

The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee. If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.

What is acceptable to determine compliance on a label? Labels should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If a label indicates a 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 (FSD), 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 FSD, should be rejected. Should non-domestic substitutes that were not pre-approved in writing by the FSD be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.

Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.

The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American provision. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) and [Buy American monitoring procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america).

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

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

Finding #15: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or did not have proper labeling to identify the country of origin:

Trio Cheese Sauce – Canada
Chile Sauce – Thailand
Minced ginger – China
Bean thread noodles – Taiwan
Mandarin oranges – China
Canned olives – Spain

The SFA should have procedures for checking in inventory received from distributors or vendors. The personnel approving received products and supplies, should note any noncompliant product(s) and contact the distributor or vendor to inform them the product isn't compliant with the Buy American Provision. The SFA and distributor or vendor should discuss the availability of compliant options, if any exist. If no options are available then the SFA should complete the [noncompliant product template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>) noting reasons for the exception. It is a best practice to retain all documentation (i.e. email, phone notes, etc.) related to the exception.

Corrective Action Required: The SFA should review its inventory check in procedures and provide a summary detailing the changes in procedures to ensure future products meet the Buy American Provision. If no procedures currently exist, the SFA should develop procedures for monitoring and receiving inventory, with guidance from the [DPI SNT Contract Management webpage](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>).

The SFA should also begin using a [noncompliant product template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) for tracking non-domestic products (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>). Complete and submit forms for each noncompliant product currently in the SFAs food storage areas.

5. OTHER FEDERAL AND STATE PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Wisconsin School Day Milk Program (WSDMP) requires the distribution of free milk to free and reduced priced students in K-5. As a reminder, Point of Service (POS) milk counts for the WSDMP must be recorded by who 'did' take milk as opposed to those who 'did not' take one.

Regulations for the WSDMP can be found in the [Wisconsin School Day Milk Program State Statute](https://docs.legis.wisconsin.gov/statutes/statutes/115.pdf) (<https://docs.legis.wisconsin.gov/statutes/statutes/115.pdf>). Interpretation and guidance for the WSDMP can be found on the DPI SNT [WSDMP webpage](https://dpi.wi.gov/school-nutrition/milk-programs/wisconsin-school-day-milk) and in the [WSDMP Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf). (<https://dpi.wi.gov/school-nutrition/milk-programs/wisconsin-school-day-milk>, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf>).

Findings and Corrective Action Required: WSDMP

❑ **Finding #16:** In SY17-18, the 6th grade class moved into the K-5 elementary school building. The 6th grade students are currently offered a milk break at their respective milk benefit; free, reduced, and paid. 6th grade students cannot be claimed in the WSDMP. As the WSDMP is an annual claim, these students should be removed from current milk count totals.

The SFA can still offer milk to 6th grade students but either all students must pay the full cost of the milk or, if the SFA wishes to offer free and reduced milks to those that qualify, it can but must cover the cost of the milk from a fund outside of food service account, Fund 50.

Corrective Action Required Please remove the 6th grade students from the SY17-18 WSDMP claim and submit a statement detailing the number of milks removed from the claim. Additionally, please submit a summary detailing how the district will proceed if it chooses to offer milk to the 6th grade students for the remainder of the SY17-18 school year.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

