

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

School Food Authority: Osceola School District	Agency Code: 484165
School(s) Reviewed: Osceola Elementary School	Review Date(s): 12/10/18– 12/11/18
	Date of Exit Conference: 12/11/18

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

The food service director did an excellent job preparing for the review. Documentation was sent prior to the on-site visit well in advance. Additionally, the director was 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 at the elementary school were welcoming, knowledgeable, and clearly dedicated to their work.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

Technical Assistance:

- Of the 262 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 0.76%, which is low enough to not require an independent review of applications or benefit issuance fiscal action. An additional five errors were identified outside of the benefits issuance sample. These errors have been recorded on the SFA-2 form and are not used to determine error percentages.

Determining Official Signatures on Electronic Applications

- The SFS utilizes electronic applications that households can submit via the district's software system. The determining official processes the electronic applications through the software system, then prints the applications out for reference and retention. When the applications are printed, the date of approval/processing and the official's name are automatically included on the processed application. This process is acceptable, however it may be worthwhile to reference the first question of the Section 3: Question and Answers in the [Eligibility Manual](#) on page 72 for more information about electronic application determinations (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Program Names for Case Numbers on Applications

- Beginning in the school year 2018-19, WI DPI requires that program names be reported with case numbers when provided on an application. Applications with case numbers but no program name listed are considered incomplete until the missing information is obtained from the household. As a reminder, only Food Share, W-2 Cash Benefits, and FDPIR programs can be listed with case numbers on applications.

Case Numbers

- As described in the [Eligibility Manual](#) on page 34, when a household submits an application with a case number, the determining official should compare the application to the direct certification list to determine if any of the children on the application are on the list (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>)
- When a match is not found, the official should contact the household for clarification or approve the application and then verify it for cause. Verifying for cause is not required in these scenarios,

but could be warranted. It is important to treat these scenarios consistently and equitably, so if one application will be verified for cause when the case number does not match to the direct certification list then this should be done in all similar cases as well.

Joint Custody

- When a child physically changes households in a joint custody situation, that child can extend their direct certification match (except for an E code indicating foster status) to all other children in both households. If the child in the joint custody scenario receives a benefit based on an application, then benefit does not automatically extend to other children in the households. See the [Special Situations](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/free-and-reduced-special-situations-in-a-nutshell.pdf) resource for more details (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/free-and-reduced-special-situations-in-a-nutshell.pdf>).

Extension of Benefits

- The effective date of a benefit established via DC extension (such as by a sibling or other household member) is the date that the determining official receives documentation or knowledge of the shared household members.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination. Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year.
- Wisconsin DPI requires source documentation of the student's previous eligibility. 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 DC 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. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.
- The effective date of eligibility is the date the determining official receives acceptable documentation to establish a meal benefit. Backdating of eligibility dates is not allowable, so quick establishment of benefits for transfer/new students via source documentation receipt from another SFA, submission of a new application by the household, or a direct certification match is crucial.

Direct Certification (DC) for Pre-K

- Although pre-K students do not have access to breakfast or lunch programs and the Special Milk Program operates under the non-pricing plan, direct certification information for pre-K students may be obtained. The SFA has been excluding pre-K students from DC runs since eligibility information is not needed for these students. However, it is acceptable and encouraged to begin including all pre-K students in DC runs. DC matches for pre-K students can be extended to other children in the household for meal benefit establishment. Additionally, DC information for pre-K students can allow these students to receive the benefits for which they are eligible for the 30 day carryover period into the following school year when they begin kindergarten.

Disclosure

- The SFA currently follows appropriate procedures for obtaining parental consent prior to sharing free/reduced eligibility information for non-program purposes. However, the process of sharing of the information between the determining official (DO) and other school officials could be

streamlined. One way to do this could be to utilize a shared Google Doc. The DO could add students names to specific Google Docs for each non-program purpose when parental consent is obtained. The Google Docs could then be electronically shared with the appropriate school official(s) to access this list of students for which parental consent to share information for fee waivers was obtained. It is important that the information is only shared after consent is received and that only the appropriate school officials have access to each Google Doc. For example, a document listing all students that will receive athletic fee waivers based on free/reduced meal eligibility should only be shared with the athletic director or other official responsible for waiving the athletic fee.

- 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>).

Discontinuation of Benefits After Carryover

- As a reminder, when a household's benefit expires at the end of the 30 day carryover period, a notice of adverse action must not be sent to the household. Adverse action confers a right to appeal the discontinuation of benefits, but households do not have this appeal right due to benefit expiration after carryover because no eligibility determination was made during the current school year. A courtesy letter could be sent to the household to advise that benefits will expire at the end of the 30 day carryover, however the letter must not convey appeal rights. The SFA is currently handling carryover correctly, but this is a common topic of question and warrants clarification. Please reference page 54 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) for additional details (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding A:** One student was improperly receiving a free meal benefits from direct certification, however the direct certification runs indicated the student should receive a reduced price meal benefit.

Corrective Action: Send an adverse action letter to the household stating that the meal benefit will be decreased to reduced price benefit status in 10 days from the date the letter is sent. Change the student's meal benefit in the software system on the 10th day. Submit a copy of adverse action letter.

- ❑ **Finding B:** Two students (from separate households) were approved for free meal benefits based on benefit approval letters from other school food authorities (SFA). Source documentation (i.e. a copy of direct certification run or copy of the household's application) was not obtained from the other SFAs to establish a meal benefit. In Wisconsin, source documentation is required to establish meal eligibility for students transferring from another SFA.

Corrective Action: Obtain source documentation for these students by:

- Contacting the SFAs these two students transferred from, or the SFA that has access to the source documentation needed to establish meal eligibility
- Running direct certification to see if the students show up
- Contacting the households and requesting an application submission

If source documentation is obtained, retain with free/reduced documents and update the software system as applicable. If source documentation cannot be obtained, send an adverse action letter to each household stating that the meal benefit will be decreased to paid status in 10 days from the date the letter is sent. Change the student's meal benefit in the software system on the 10th day. Submit copies of the received source documentation or adverse action letter(s).

- ❑ **Finding C:** Free meal benefits were not extended to two students that should have been eligible by extension. One of the students has been receiving reduced meal benefits and one has been at paid status.

Corrective Action: Update the software system to instate free benefits for these students within three days. Send an increase in benefits letter to the household notifying them that the two students are now eligible to receive free meals due to findings on the administrative review.

- ❑ **Finding C:** Two students free meal benefits from direct certification matching in January 2018 were continued past the end of the 30 day carryover period for the school year 2018-19. These students should have changed to paid status after carryover ended. These students share a household with a directly certified reduced eligible student matched in August 2018. Therefore, this reduced price meal benefit should extend to the two students in question.

Corrective Action: Notify the household in writing that these two students benefits will change from free to reduced in 3-5 days (specify the exact date). It is recommended to call the household as well and provide a verbal explanation of the benefit decrease, to ensure the household is aware of the need to put money into student accounts. The household should be given a reasonable amount of time to put money into student accounts prior to the benefit decrease to minimize unpaid meal charges (i.e. 3-5 days). Because this error resulted from failure to properly drop off at carryover, adverse action and the corresponding appeal rights do not apply. Submit a copy of the letter sent to the household

- ❑ **Finding D:** The staff members that are given individual students' free/reduced information for fee waivers and other non-program purposes do not have signed disclosure agreements on file.

Corrective Action: Submit signed disclosure agreements for staff members receiving meal benefit information for non-program purposes.

- ❑ **Finding E:** 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:

- While it is acceptable to utilize the standard sample for verification, it is not required unless notified by DPI based on the non-response rate from the prior school year. SFAs that are not required to use standard sampling may elect to use either alternate sample sizes one or two at their discretion.
 - If a household selected for verification does not respond to the request for documentation submission, then the benefit must be discontinued within the appropriate time frame. If a household experiences a loss of benefits due to failure to submit requested verification documents and attempts to reapply for benefits later in the school year, the household is required to submit income information or proof of participation in an eligible assistance program along with the completed application. Please reference page 59 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) for additional details (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).
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Meal Counting and Claiming

Technical Assistance:

Pre-K and Wraparound Care

- The current procedures utilized for feeding pre-K students in the various meal programs are appropriate and meet requirements. All students enrolled in pre-K have access to the Special Milk Program (SMP) and are claimed in the program as applicable. Pre-K students that also participate in the “Kids’ Klub” wraparound care have the opportunity to eat breakfast and/or lunch as part of their care. When pre-K children in wraparound care eat breakfast or lunch, their meals are not claimed for reimbursement and the Kids’ Klub is billed non-program food prices for the meals. There is no double claiming for these students, as they are only claimed under SMP and are never claimed under the breakfast or lunch programs. Great job establishing efficient procedures for feeding these children!

Visiting Students

- Please note that SFAs may claim visiting students in the paid category or the individual’s benefit category with documentation, unless they are from a CEP school.

Point of Service for Field Trips

- Counts used for reimbursement claims must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal. Because field trip meals are claimed for reimbursement, there must be an appropriate POS process in place for serving, counting, and claiming these meals. Counting meals and charging students that ordered meals when the meals leave the kitchen for the field trip is not an acceptable POS. In this method, there is room for error if students order but do not take their meal, end up not going on the trip, get sick or leave prior to the meal, or other such discrepancies.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding F:** The current POS system for field trip meals does not meet POS requirements. Currently, student accounts are charged for field trip meals when the meals leave the kitchen for the field trip. Any students that get sick or do not eat their meal are then refunded later. This constitutes a “back out” system of counting and claiming since meals are charged to student accounts before the student takes and eats the meal.

Corrective Action: Please modify the field trip POS system so that students are checked off by the accompanying teacher as they take their meal. Completed check off sheets should be returned to food service and used for charging student accounts and claim submission. The [Field Trip meal resources](#) can be of assistance in the modification of field trip POS (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). Please submit a written plan detailing how field trip meals will be counted and claimed going forward, including a copy of the check off sheet that will be used at the POS.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- It was a pleasure working with and visiting the Osceola School District. Sincere appreciation is extended to the food service director and lead cook who both provided thorough and organized documentation prior to the on-site review. Thank you for the prompt communication!

- There were no meal pattern errors found during the week of review. All entrée and alternative options were compliant with meal pattern. Excellent! Proper documentation (crediting documentation, recipes, production records, etc) is being completed and updated appropriately.

Technical Assistance:

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. 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Signage

- Breakfast signage is currently posted outside the cafeteria. Consider hanging larger breakfast signage next to the lunch signage in the service line. Signage examples can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Clementine Fruit Crediting

- Clementines were incorrectly planned to credit as ½ cup of fruit at lunch on December 10. Per the [Food Buying Guide](https://foodbuyingguide.fns.usda.gov), a clementine credits as 3/8 cup of fruit (<https://foodbuyingguide.fns.usda.gov>). A helpful [fruit and vegetable crediting handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) is available on the SNT webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding G:** During lunch service on December 10, four students refused to select the required ½ cup combination of fruit and/or vegetable to make a reimbursable meal. *Fiscal action must be assessed for these non-reimbursable meals.*
 - There are two places in the service line that could be changed to encourage students to select the required ½ cup fruit and/or vegetable to make a reimbursable meal:
 - Offer the fruits and vegetables in the service in a ½ cup portion (on the day of review 3/8 cup clementine, ¼ cup apples, and ¼ cup broccoli was offered on the serving line)
 - Utilize signage and appropriate utensils on the salad bar so students and staff are aware of how many pieces of vegetables constitute a “serving.” Additional signage on a salad or garden bar can assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) with pictures that can be posted on a salad or garden bar (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

Corrective Action: Submit a written plan of action to ensure students select ½ cup fruit and/or vegetables at Osceola Elementary School. If applicable, submit a photo.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance:

Annual Financial Report (AFR)

- The AFR should match the PI-1505 report, and discrepancies should be investigated. Records indicated that the discrepancy was related to reporting of rebates. Please reference the [AFR instructions](#) which states that cash refunds and rebates for food received during the school year should be subtracted as a negative food expenditure before entering food costs on the expenditures screen of the reports (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>). See corrective action below.

Angel Fund Donations

- While the SFA does not currently utilize alternative funding sources, such as community donations into an “Angel Fund,” there are some considerations if such donations will be used in the future to assist families that struggle to pay for school meals. Pages 44-46 of the [2017 USDA Overcoming the Unpaid Meal Challenge](#) resource provide some details on using community donations to assist with negative balances (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-29-2017a2.pdf>).
- Question 16 of the [DPI SNT Financial Q & A](#) resource also addresses this topic (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>).
- One key consideration when considering using donations to offset negative balances is how funds will be distributed equitably to families in need. The district should develop a written procedure and criteria to aid in determining how donations will be distributed to families in need of assistance.

Account Balance Refunds

- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed” they cannot be kept by food service, unless *paid* households have *chosen to donate* those funds to the school food service account.
- Households that cannot be contacted and refunded in full must have all funds left in the student meal accounts turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](#) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).
- The SFA’s current unpaid meal charge policy states that refunds will be issued if the account balance is over \$2.00. Consider revising this language going forward to align with account refund requirements. There is currently no approved flexibility to the refund requirements to allow a dollar threshold to be set for permitting or denying refunds. Please reference the [DPI SNT Financial Q & A](#) refund section on page 14 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding H:** The total revenues and total expenditures reported annual financial report (AFR) do not match the 17-18 PI-1505. However, the ending fund balance on the AFR does match the PI-1505.

Corrective Action: Collaborate with the appropriate staff members to investigate the discrepancies between the reports. If necessary, correct and resubmit the annual financial report. This can be completed online until December 31. After December 31, any changes to the AFR must be done 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 or the discrepancy has been otherwise resolved.

Revenue from Non-Program Foods

Commendations:

- The food service director completed the non-program foods revenue tool for the school year 2017-18, which indicated compliance with the revenue requirements. The director is on track to complete the tool again for 2018-19 in the next few months to assess compliance with non-program food revenue requirements.
 - All non-program foods revenue requirements, including proper allocations on the annual financial report, appear to be met at the present time.
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4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

- The SFA's procedures for accommodating special dietary needs is compliant with the current regulations and supports equitable accommodations for meal program participants that require special dietary needs.
- The public release was sent to several grassroots organizations above and beyond the minimum requirements. Great job putting forth effort to advertise to the community the availability of free and reduced price school meals offered in the SFA!

Technical Assistance:

Non-Discrimination Statement

- When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). The SFA should add the full non-discrimination statement to the food service webpage, as it currently is not included as part of the webpage which contains program information.

And Justice For All Poster

- The *And Justice For All* poster must be displayed in a prominent location and be visible to program participants. The position of the poster should allow participants to easily read it, therefore the height of the poster should be at an appropriate level for the children in each school. The food service director took action on-site to move the poster to a lower position on the wall so it is more visible for the elementary students.

Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service of the state agency within five days. This should be included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the

[USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](https://fns-prod.azureedge.net/sites/default/files/113-1.pdf) resource (<https://fns-prod.azureedge.net/sites/default/files/113-1.pdf>).
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Local Wellness Policy (LWP)

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 (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-team-wellness-policy-webpage) ([https://dpi.wi.gov/school-](https://dpi.wi.gov/school-nutrition-team-wellness-policy-webpage)

nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>).

- Additionally, the SFA is required to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Resources:

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

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding I:** The local wellness policy (LWP) does not contain required language pertaining to food/beverage marketing. Further, it is recommended to remove language referencing the USDA Dietary Guidelines for Americans, 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:

- At the time of the on-site review there were no competitive foods or beverages sold at Osceola Elementary School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. Fundraiser tracking tools can be found on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Professional Standards

Technical Assistance:

Annual Training Requirements and Tracking

- The food service director was beginning to use an electronic tracking tool during the course of the review. Previously, staff members submitted certificates for completed trainings to the director for manual tracking. The DPI tracking tool was nearly completed while on-site. Review of all available professional standards training documents for the 2018-19 school year indicated that all staff members, except the director, have already completed all required hours. Please note that time spent collaborating with DPI for the review can be counted as professional standards training hours—particularly the time spent during the on-site visit on discussing questions, errors, and corrective actions.

Two Year Flexibility

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

Technical Assistance:

Food Safety Plans

- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- 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.

Food Safety Inspections

- The most recent food safety inspection reports must be posted in publicly visible location that is visible throughout the day, including when meals are not being served.

Findings and Corrective Action Needed: Food Safety

- ✓ **Finding J:** The most recent food safety inspection report was not posted in publicly visible locations at the review sites. The report was posted in the serving area which is closed off when meals are not being served, thus it was not in a publicly visible location.

Corrective Action: Report posting was corrected on site. No further action required.

- ❑ **Finding K:** Reimbursable field trip meals are offered, however there was not a corresponding standard operating procedure (SOP) in any schools' food safety plan.

Correction Action: Submit an SOP for field trip meals to reflect site-specific procedures including food handling, storing, transporting, and the leftover food procedure. A [template field trip SOP](#) which can be modified to be site-specific is available on the [food safety webpage](https://dpi.wi.gov/school-nutrition/food-safety#templates) (<https://dpi.wi.gov/school-nutrition/food-safety#templates>). The SOP should be added to food safety plan at any schools where field trip meals are offered.

Buy American

Findings and Corrective Action Needed: Buy American

- ❑ **Finding L:** Several items found not to be compliant with the Buy American provision were not documented. Documentation is kept for some non-domestic items. However, the following items were identified in storage on December 10 and documentation was not available:
 - Sugar snap peas- Mexico
 - Monterey vegetable blend- USA and Mexico

Corrective Action: Submit completed documentation for the above items as well as seasonal items. It is recommended to check for new/substitution products and their country of origin multiple times per semester (e.g. once every month). A suggested [Buy American - Non Compliant Product List template](#)

can be found on the Buy American webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

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 Osceola 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:** Summer Food Service Program outreach was not completed per the USDA requirement to inform families of where their students can receive a free meal in the summer months.

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.

Special Milk Program (SMP)

Technical Assistance:

Free Milk Option

- The SFA operates the SMP under the non-pricing option and meets all requirements for utilizing this option. No students are charged for their milk and all milks served to eligible students are claimed in the paid category. Because all milks served in SMP are considered “program foods” and are claimed for reimbursement, it is allowable for the SMP to run in the negative and for Fund 50 to cover the cost of providing free milk to all eligible students in the SMP.

Point of Service

- Counts used for reimbursement claims must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal. Using morning attendance, milk counts taken prior to service, and counting based on the number students that do not take milk are not acceptable. In these

methods, there is room for error if students order but do not take their milk, leave school before service time, or other such discrepancies.

Findings and Corrective Action Needed: Special Milk Program

- ❑ **Finding N:** While the point of service (POS) procedures for the SMP appear to yield accurate counts for reimbursement, the process involves some “back out” procedures. Students are crossed off the class list when they do not take a milk and the remaining names are scanned later in day and tabulated for reimbursement claim submission. Essentially in the current system, milks are counted when they are taken to the classroom and then counts are adjusted after-the-fact if students that ordered a milk do not take one at the allotted milk break time. The POS process must be modified so that milks are counted at the time it can be confirmed they are actually served to an eligible child—not prior to service time.

Corrective Action: Develop a plan to modify the POS process for SMP so that milk counts are recorded at the time that students are actually served. Submit the written plan to the consultant.

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 student success.

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



With School Nutrition Programs!