

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

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**School Food Authority: Almond-Bancroft School District    Agency Code: 49-0105**

**School(s) Reviewed: Almond-Bancroft Middle School**

**Review Date(s): 1/9/18-1/10/18**

**Date of Exit Conference: 1/10/18**

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

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

**Appreciation/Commendations:**

Thank you to the Superintendent, Determining Official, Food Service Director, Business Manager, and Food Service employees for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. Everyone was 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. Thank you for all that you do to feed the students healthy meals! You are much appreciated!

**REVIEW AREAS**

**1. MEAL ACCESS AND REIMBURSEMENT**

**Certification and Benefit Issuance**

**Commendations**

Applications were very well documented and determined. When the Determining Official needed to follow up with a household, she documented on the applications the new information that she received to support the eligibility status determinations. All eligibility determinations were made correctly. Direct Certification is run early, often, and at the required time frames. Well done!

- 113 eligibility determinations were reviewed; 0 errors were identified.

**Technical Assistance/Compliance Reminders**

**Disclosure**

- For any staff that has access to students' eligibility status that isn't the Determining Official, they must sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This includes the cashiers and any other district staff. This is to protect the students from any overt identification of their meal eligibility status. 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>).

## Verification

### Commendations

Verification was well done and completed in a timely manner, prior to the November 15 deadline. One application was verified. A confirmation review took place and the Confirming Official signed off on this task. The Verifying Official also signed off on the original application. The DPI notification letters were used for Verification which had all of the required information. The Verification Collection Report was completed prior to the February 1 due date and was completed correctly. Job well done!

## Meal Counting and Claiming

### Commendations

An edit check was completed for Breakfast and Lunch at each site. The Accuclaim was used to submit the claims and all claims were submitted correctly and in a timely manner. Nice job!

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to the food service staff at Almond-Bancroft Middle School for your dedication to providing healthy, balanced, nutritious and appealing meals to the students of your school. Thank you to the food service director for sending meal pattern documentation very early prior to the on-site review. We appreciate your timely communication. Meals are served in a friendly, fun, and helpful learning environment thanks to the assistance of all staff. The murals on the walls are fun and promote balanced eating.

### Comments/Technical Assistance/Compliance Reminders

❑ **K-8 Meal Pattern:** Rather than serving a K-5 meal pattern and a 6-8 meal pattern, it may be beneficial to simplify to a K-8 meal pattern for all K-8 students. A K-8 meal pattern makes menu planning easier for school nutrition professionals, and Offer Versus Serve is in place to minimize food waste.

❑ **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>).

At this time, pre-K students are being served co-mingled with K-5 students; therefore, the pre-K students may continue following the NSLP K-5 meal pattern. If pre-K students were to be served separately from K-5 students, the CACFP meal plan would need to be followed.

❑ **Condiment Portions:** Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. 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.

Promote correct serving sizes by adding signage at the condiment station with a photo of what one tablespoon of dressing looks like, purchasing single-use one ounce cups to aid in portion control, or using signage such as "One squeeze, please!" on self-serve squirt bottles.

**☐ Breakfast signage:** Breakfast and lunch signage was posted and filled in with the daily menu. However, breakfast signage did not specify the number of food items that each menu item was planned as. Technical assistance was provided.

It up to the menu planner to determine in advance whether items crediting as 2.0 ounce equivalents (oz. eq.) count as one or two food items. He or she must clearly communicate to students what foods they can select in order to have three food items, one of which is ½ cup fruit and/or vegetable, for a reimbursable breakfast. Even though the menu planner planned on larger/combo items to be counted as 2 items, students should be aware of how items count through the use of signage. (For example, the 3.6 oz muffin served on the day of observation was 2.0 oz. eq., so it could be counted as either one or two food items).

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

#### **☐ Finding #1: Standardized Recipes**

Standardized recipes were missing for several of the foods offered during the week of review. These are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

**Corrective Action Needed for Finding #1:** Please submit a standardized recipe for the following:

- Smoothies
  - 9 fl oz
  - 12 fl oz
- PBJ sandwich
- Ham sandwich
- BBQ sandwich
- Chicken Patty sandwich

#### **☐ Finding #2: Production Records**

Milk is a required component as part of the National School Lunch Program. You must record daily usage by milk type on your production records. Milk counts were not recorded on 11/7 and 11/10/2017.

Planned portion sizes are required for every meal component, including components from the salad bar. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Remember, fruits and vegetables credit by rounding down to the nearest 1/8<sup>th</sup> cup. Grains and meats/meat alternates credit by rounding down to the nearest ¼ ounce equivalent.

**Corrective Action Needed for Finding #2:** Submit one up-coming 5-day week of completed lunch production records that have all components recorded.

### ❑ Finding #3: Menus

The printed menu should list all components included with the reimbursable meal. Currently, fruit is not listed at breakfast. It can either be listed daily, or with the “juice served daily with breakfast” statement. (Ex, “assorted fruit served daily”)

Milk types need to be listed daily for lunch or breakfast, or with the “milk carbs” statement (Ex, “Skim, Skim chocolate, and 1% offered daily”)

**Corrective Action Needed for Finding #3:** Submit an updated menu with all necessary statements and components listed.

### ❑ Finding #4: Juice Limit

No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. Once fruit is pureed (as it is in a smoothie) it is considered fruit juice since it is consumed as a beverage. This limit applies separately to breakfast and lunch. It is possible to offer juice daily and meet the 50 percent juice limit if it is offered along with fruit (fresh, frozen, dried, or canned) in the equivalent amount. For example, ½ cup fruit pieces can be offered alongside ½ cup 100% juice each day, and still meet the 50 percent limit.

Here is how the smoothie alone credits:

- A 9 oz smoothie credits as 2 oz eq MMA and ¾ c fruit juice (which would mean that students offered the smoothie would need access to ¾ fruit)
- A 12 oz smoothie credits as 3.25 oz eq MMA and 1-1/4 c fruit juice (which would mean that students offered the smoothie would need access to 1-1/4 c fruit)

If the daily 4 oz juice cup is offered with the smoothies,

- students with the 9 oz smoothie need access to 1-1/4 c fruit (3/4 c fruit to match 3/4 c juice from smoothie, and ½ c fruit to match ½ c from juice cup)
- students with the 12 oz smoothie need access to 1-3/4c fruit (1-1/4 c fruit to match 1-1/4 c juice from smoothie, and ½ c fruit to match ½ c from juice cup)

**Corrective Action Needed for Finding #4:** Submit a written plan of action the school will take to offer no more than 50% of fruit in the form of juice/puree over the course of the week at breakfast. Include serving sizes, standardized recipes, or nutrition facts labels, if applicable.

### ❑ Finding #5: Vegetable Sub-groups

During the week of review (November 6-10 2017) only ¼ cup of “other vegetables” was offered in the form of 1/8 cup green pepper and 1/8 cup cucumber on Friday. Students K-8 must be offered ½ cup of “other vegetables” weekly.

**Corrective Action Needed for Finding #5:** Submit a written plan of action the school will take to meet the ½ cup “other vegetable” requirement.

### ❑ Finding #6: Weekly Grain Shortage

**There was a weekly grain shortage during the week of review.** If students have the option to select the chef salad daily, there will be a weekly grain shortage. One (1) slice of bread (1 oz eq grain) is offered with the chef salad entrée with no other access to grains. While this does meet the minimum daily grain requirements (1 oz eq) it results in a weekly shortage (1 oz eq x 5 days = 5 oz eq grains per week). The weekly minimum for K-8 students is 8 oz eq grain.

At the time of on-site review croutons were being served as an “extra” with the chef salad entrée and not being credited towards the meal pattern. If croutons are whole-grain rich they can be credited as part of the grain component. According to Exhibit A, 0.8 oz croutons is equal to 1 oz eq grain. The 0.5 oz packages of croutons could credit as ½ oz eq. Consider crediting these towards the meal pattern to contribute towards the daily and weekly grain component. However, keep in mind that ½ oz. eq. grain is not a full component as 1 oz. eq. grain is a full component under the K-8 meal pattern.

If 1 slice of bread and 2 packages of croutons were offered with the chef salad entrée, a total of 2 oz eq grains would be offered. This would meet daily and weekly requirements for all age groups.

**Corrective Action Needed for Finding #6:** Submit a written plan of action the school will take to offer daily and weekly grain requirements for the chef salad entrée.

### 3. RESOURCE MANAGEMENT

#### Commendations

The SFA has an Unpaid Meal Charge Policy in place and it was published in the school newsletter. The district is currently working on updating the policy.

#### Technical Assistance/Compliance Reminders

##### **Unpaid Meal Charge Policy**

- The Unpaid Meal Charge Policy has very general language and it is advised that it includes more detailed information regarding when families will be notified of the account balance, how often they will be notified, when a la carte purchases are disallowed, and alternate meals to prevent the negative account balances and from having to transfer non-federal funds. Currently, any student with a negative balance can purchase any item they choose and not be penalized for it. It was noted that there were many negative accounts. To combat this, you may set a district policy to disallow a la carte sales to any student regardless of benefit status (Free, Reduced, or Paid). Create signage to teach the students that they have to take a reimbursable meal if they want to get the ‘meal deal’ and have bowls of whole fruit, packages of raisins, craisins or other fruit/vegetable that a student can take to make their meal reimbursable at the end of the line by the cashier. It’s important to teach the students what they can take to make a reimbursable meal so that they are not charged the a la carte price. Cashiers may see if a student is free if it is deemed necessary and cannot deny a free student a meal. However, you can deny a reduced or paid student a meal if they have surpassed the negative amount (for example, -\$20.00) set in the policy. Once they surpass that -\$20.00 mark, you can offer them an alternate meal. The alternate meal is the penalty and meant to encourage students to bring money or have their parent/guardian deposit money into their lunch account. You are also still feeding the student by offering the alternate meal, but offering a less desirable meal option for them. You may refer to the [Unpaid Meal Charges “In a Nutshell”](#) to see your options regarding alternate meals. Depending on whether you claim, charge, or giveaway the alternate meals, there are rules for each option. You may have a stricter policy for the older grades than the younger grades, such as cutting the older students off from getting an alternate meal. This is a district decision.
- As a reminder regarding alternate meals, if you decide to offer them free of charge and do not claim them, be sure to keep track of the number of alternate meals you serve throughout the year. Keep track of the food cost, labor, and other expenses as well. Make a transfer from Fund 10 or another non-federal fund to Fund 50 to cover the costs of these alternate meals.
- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses

unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).

### **Allowable Costs**

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found on the [Financial Management](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>). A best practice is to continue to collect on the unpaid meal charges as long as you are able to and the student is still enrolled. If unable to collect, then a transfer is required to Fund 50 from Fund 10 or another non-federal fund.
- Refer to the [Financial Q&A](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>). Per question 15, student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50. Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50.

### **Paid Lunch Equity (PLE)**

#### **Commendations**

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. Great job running this tool!

#### **Technical Assistance/Compliance Reminders**

- Currently, there are 3 separate meal patterns being followed at Almond-Bancroft. The K-5, 6-8, and 9-12 meal patterns are being followed. This means that portions offered will differ among the grade groupings and the lunch prices do not reflect the different tiers. The Middle School students pay the same price as the High School students but do not get the same portions. It is advised to review the meal pattern, decide whether you want to follow the K-8 and 9-12 meal pattern. That way, you could have the Elementary School and Middle School lunch priced the same, and the High School would be slightly more than the other schools. If you decide to keep the current 3 meal patterns, you should consider having tiered pricing.
- If Fund 50 has an excess cash balance greater than or equal to 3 months operating expenses at the end of the school year, you may apply for a PLE exemption.

### **Revenue from Nonprogram Foods**

#### **Commendations**

Using the 2016-17 Annual Financial Report data, the USDA Nonprogram Food Revenue calculation was completed to find the SFA was charging their nonprogram foods correctly within the 16-17 school year. The district also used the DPI Nonprogram Food Calculator Tool for the 17-18 school year and updated their nonprogram food prices accordingly. It is well done and shows that they are not using Federal reimbursement to subsidize the cost of the nonprogram foods.

#### **Technical Assistance/Compliance Reminders**

- Nonprogram foods sold at Almond-Bancroft School District include: Adult Meals, A la Carte, Extra Entrees, and Extra Milk.

- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

- Using the Child Nutrition Program Report from the 16-17 SY and the above USDA Nonprogram Food Revenue Tool, the SFA is adequately pricing out its nonprogram food prices. Almond-Bancroft School District is in compliance with the USDA Nonprogram Revenue Tool.

#### 4. GENERAL PROGRAM COMPLIANCE

##### Civil Rights

##### Commendations

Civil Rights training was completed at the beginning of the school year for all staff involved with the School Nutrition Programs and eligibility statuses. The PI 1441 form was completed correctly and done prior to the October 31 deadline.

##### Technical Assistance/Compliance Reminders

##### **And Justice for All Poster**

- “And Justice for All” posters need to be posted in public view where the program is offered, preferably the cafeteria, adjacent hallway, or school main office. The poster must be placed in a location that enables program participants to read the text of the poster without obstruction.

##### Findings and Corrective Action Needed:

- ❑ **Finding #1:** The And Justice for All poster was posted in the kitchen where the meal service line is, but is closed off when meal service is not occurring. Since this is not open every hour of the day, one of the posters needs to be moved to a public space such as the cafeteria, adjacent hallway, or the school main office.

**Corrective Action Needed:** Post the poster in one of the public settings listed above. This was corrected on site. **This was corrected on site. No further action required.**

##### Local Wellness Policy

##### Commendations

The Wellness Policy is currently under review and needs to be approved by the school board. It was last updated in April 2017 and will be available online once it is complete. Many of the required elements are listed in the LWP. Committee plans to meet and put all updates to the LWP on the school website. The district plans to complete their first assessment of the LWP in March 2018.

##### Technical Assistance

- While there are goals listed in the Wellness Policy, they should be updated to be measurable. For example, explain how often students will participate in physical activity per week. Another example, if teaching students a lesson in nutrition education, explain how often they will

receive a lesson in nutrition education, who will teach the lesson, and what the lesson(s) will be focused on.

- The person in charge of the entire LWP should be listed within the policy.

#### **SFA is required to complete an assessment of the LWP:**

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](https://dpi.wi.gov/school-nutrition/wellness-policy) webpage (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy is available at the [USDA Wellness Policy](http://www.fns.usda.gov/tn/implementation-tools-and-resources) webpage (<http://www.fns.usda.gov/tn/implementation-tools-and-resources>). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the [Wisconsin Health Atlas](https://www.wihealthatlas.org/lwp/) webpage (<https://www.wihealthatlas.org/lwp/>). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

#### **SFA required to inform the public of the results of the most recent assessment:**

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA 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.

#### **Smart Snacks**

##### **Commendations**

Thank you to the administrators who record and monitor Smart Snacks. Your timely communication and organization is appreciated.

##### **Technical Assistance/Compliance Reminders**

☐ **Smart Snacks:** The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. All food and beverage 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. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

☐ **Al a carte:** At the time of on-site review al a carte snacks were being sold to middle and high school students in the lunch line. Thank you for verifying that these al a carte items are Smart



Snack compliant for the appropriate age groups. Please continue tracking and ensuring Smart Snack standards are being met for all products.

**Findings and Corrective Action Needed:**

**❑ Finding #1: Grade-Group Compliance and Defined School Day for Vending Machines**

The vending machines at Almond-Bancroft High School have Smart Snack compliant offerings for high school students. However, some of the items in the vending machines are not Smart Snack compliant for elementary and middle school students. All grade groups are housed in one building. The vending machines are currently on from 4pm-7am and during the high school lunch period. The school day is defined as beginning at midnight and ending 30 minutes after the end of instruction. Multiple grade groups currently have access to vending machines with beverages from midnight- 7 am. Products must meet Smart Snacks standards for the youngest age/grade group.

Products offered need to be altered so that they are Smart Snack compliant for the youngest grade group. Alternatively, the vending machines need to be turned off during the totality of the school day (midnight- 30 minutes following the end of instruction) so that the youngest grade group does not have access to non-compliant products. It is acceptable for the vending machines to be on during the high school lunch period, since only high school students have access. We recommend using the [Alliance for a Healthier Generation Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) to assess product compliance.

PRODUCT	SIZE (fl oz)	ELEMENTARY	MIDDLE	HIGH
Diet Coke	20	NO- not allowable	NO- not allowable	YES- must be ≤20 fl oz
Dasani water	20	YES- at all sizes	YES- at all sizes	YES- at all sizes
Vitamin Water 0 cal	20	NO- not allowable	NO- not allowable	YES- must be ≤20 fl oz
*Mixed berry juice	10	NO- must be ≤8 fl oz	YES- must be ≤12 fl oz	YES- must be ≤12 fl oz
*Grape juice	10	NO- must be ≤8 fl oz	YES- must be ≤12 fl oz	YES- must be ≤12 fl oz
*Fruit punch juice	10	NO- must be ≤8 fl oz	YES- must be ≤12 fl oz	YES- must be ≤12 fl oz
Power Aide 0 cal	12	NO- not allowable	NO- not allowable	YES- must be ≤20 fl oz
Diet Pepsi	20	NO- not allowable	NO- not allowable	YES- must be ≤20 fl oz
Diet Mt. Dew	20	NO- not allowable	NO- not allowable	YES- must be ≤20 fl oz
Aquafina water	20	YES- at all sizes	YES- at all sizes	YES- at all sizes
SoBe water 0 cal	20	NO- not allowable	NO- not allowable	YES- must be ≤20 fl oz
Propel	20	NO- not allowable	NO- not allowable	YES- must be ≤20 fl oz
Fruit Shoots	10.1	NO- must be ≤8 fl oz	NO- not allowable	YES- must be ≤12 fl oz
*Apple juice	10	NO- must be ≤8 fl oz	YES- must be ≤12 fl oz	YES- must be ≤12 fl oz
*Orange juice	10	NO- must be ≤8 fl oz	YES- must be ≤12 fl oz	YES- must be ≤12 fl oz
Vita Ice	17	NO- not allowable	NO- not allowable	YES- must be ≤20 fl oz

\*All juice must be 100% fruit juice to be compliant for any grade

**Corrective Action Needed for Finding #1:** Please submit a written statement explaining how the school will ensure that each grade group will only have access to beverages that are compliant for their grade group during the school day.

## Professional Standards

### Commendations

The district is doing a wonderful job making sure staff are getting their required training hours either over summer or during the school year that pertain to their job duties. The Determining Official and Business Manager attended SNSDC classes over the summer. The SFA used an Excel spreadsheet to track all training hours for staff involved with the School Nutrition Programs.

### Findings and Corrective Action Needed:

- **Finding #1:** Tracking tool used for tracking training does not contain all of the required elements. The current tracker is missing the date of hire for each employee along with the employee's position title, and the hours worked per week pertaining to the School Nutrition Programs.

**Corrective Action Needed:** It is required that the tracker contain, at a minimum, the following fields: employee name, date of hire, employee category or position, hours worked per week, training title/subject, date of training and the length of the training.

The current tracker is missing: the *date of hire*, the *employee's position title*, and the *number of hours worked each week* within the School Nutrition Programs. These need to be added to the tracker. **Please email a copy of the updated spreadsheet.**

## Food Safety

### Commendations

The Food Safety manual was available for review and up to date. The temperature logs for the dish machine, coolers and freezers were also well documented and well organized. Nice work!

## Buy American

### Technical Assistance/Compliance Reminders

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf. The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

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

- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates

that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.

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

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

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

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

☐ **Finding #1:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Sweet and Sour sauce- Canada
- Garlic powder- China
- Mandarin oranges- China
- Stir fry vegetables- various

**Corrective Action Needed for Finding #1:** The identified noncompliant food item(s) qualify to be on the non-compliant product list, but the SFA does not have a noncompliant list/process in place for tracking.

Begin using a Noncompliant Product List for tracking nondomestic products. **Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas.** Provide the completed list as corrective action. A template form is located on the [procurement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

#### **Findings and Corrective Action Needed: Food Safety**

- ☐ **Finding #1:** The most recent food safety inspection report is not posted in a publicly visible location.

**Corrective Action Needed:** Post the most recent food safety inspection report in location visible to public, either in the cafeteria, adjacent hallway or main office. **This was completed on site. No further action required.**

## Reporting and Recordkeeping

### Commendations

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- Good work keeping all records regarding the school nutrition programs for 3 years plus the current school year.

## School Breakfast Program (SBP)

### Commendations

- The SFA is doing a great job advertising the School Breakfast Program. Letters are sent home with students during the 1<sup>st</sup> week of school regarding school breakfast. Breakfast menus are in every district newsletter mailing. A breakfast highlight is in the school newsletter throughout the school year and on social media. Breakfast menus are posted on the school web page. Nice job!

## Summer Food Service Program (SFSP) Outreach

### Commendations

- The SFA operates the SFSP during summer school. They do a fantastic job advertising it throughout the community.

### Technical Assistance

In addition to promoting the SFSP for summer school, add some of the information below. This is to inform families of how they can find locations in the state that operate the SFSP at an open site so that their children may get summer meals if their children do not attend summer school or when summer school is not in session.

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge.

## 5. OTHER FEDERAL PROGRAMS REVIEWS

### Wisconsin School Day Milk Program

#### Commendations

The 16-17 SY WSDMP claim was correctly consolidated and claimed. All reports are kept in a binder along with the data to calculate the cost of a pint of milk for the claim. This was well organized. Keep up the great work!

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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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



*With School Nutrition Programs!*