

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Kewaskum School District

Agency Code: 662800

School(s) Reviewed: Kewaskum Elementary School

Review Date(s): 11/6/18–11/7/18

Date of Exit Conference: 11/7/18

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

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 marketing and branding present in the cafeterias across the district are well-developed, appealing, and professional.

The food service staff at the elementary school were welcoming, knowledgeable, and clearly dedicated to their work. The staff members demonstrated excellent customer service via addressing students by name and providing an inviting, festively decorated cafeteria.

Overall, the school nutrition programs at the district are excellent. Noteworthy initiatives include Harvest of the Month promotions including taste testing, special themed meals, involvement in Fuel Up to Play 60, and collaboration with community organizations to promote school meals and student wellness.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Of the 218 eligibility determinations reviewed, there were no errors identified.
- The determining official did an excellent job reviewing applications, following up with households when needed, and documenting household communications with detailed notes.

Technical Assistance:

Benefit Issuance List

- It is recommended to review the benefits issuance list shortly after carryover has ended to ensure that students that are supposed to default back to paid status drop off as scheduled. An audit of the benefit effective dates can assist in this review so that any outdated effective dates (such as from the prior school year) are investigated and modified appropriately. If errors are found, be sure to work closely with the software vendor to address the underlying issue and prevent future errors. See corrective action below.

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.

Direct Certification Approval Letter

- As explained in the [Eligibility Manual](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), the written direct certification approval letters sent to qualified households must:
 - Explain the child is eligible free without further application
 - Clarify that eligibility extends to all school aged children in household
 - Inform households of how to notify LEA of any additional school aged children in household not listed on notification
 - Explain how household can decline benefits
 - Include full non-discrimination statement
- Additionally, because students in Wisconsin may be eligible for reduced meal benefits via direct certification Medicaid match, it is important to inform these reduced-eligible families that they may qualify for free meals via an income application.

Disclosure

- 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 Agreement for School Staff](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) form is located on the SNT website (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure). An example would be a school secretary receiving a student's free/reduced eligibility information with parental consent for the purpose of waiving school registration fees—the secretary in this scenario should complete a disclosure form.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding A:** During the review of the full benefit issuance list sent on 10/23/18, three students were found to be incorrectly receiving free meal benefits. These three students should have automatically changed from free to paid status on 10/22/18, which was the first operating day after the end of the 30 day carryover period.

Corrective Action for Finding A: These errors were discovered the same day the benefit issuance list was sent to DPI for review. The SFA immediately contacted the software vendor to resolve the underlying issue preventing the automatic change back to paid status at the end of carryover. These students were manually changed to paid in the POS system upon discovery of the error. The benefit issuance list assessed by DPI should not have included these students, as they were not eligible for benefits starting of 10/22/18 (the first operating day after carryover ended) and the errors were corrected the following day 10/23/18. The three students were excluded from the benefit issuance universe and subsequent sample. *Corrected prior to on-site review; no further action required.*

- ✓ **Finding B:** The free and reduced direct certification notification letters do not adequately explain the extension of benefits for other children residing in the same household as other directly

certified children. The reduced direct certification notification letter does not explain that households may be eligible for free benefits by submission of a household income application. **Correction Action for Finding B:** Please revise the free and reduced direct certification notification letters so that they contain the missing information stipulated above. Submit copies of the revised letters. *Corrected; no further action required.*

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.
 - The date of scheduled adverse action resulting from verification was scheduled to occur on November 10. Therefore, the change of the verified student's eligibility from reduced to paid in the point of service (POS) system could not be confirmed on-site. However, review of the verification documentation indicated that correct procedures had been followed and understood throughout the entire process.
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Meal Counting and Claiming

Technical Assistance:

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

Enrollment on Claims

- Different reports generated by the software vendor provide different enrollment data based on the parameters set. When completing monthly claims, please be sure to use the enrollment numbers that indicate the highest number of students enrolled at each school with access to the meal program being claimed for. Students that do not attend the school the claim is for or who do not have access to the meal program being claimed for should not be included in the enrollment number on the claim. Please work with the appropriate school staff members and software vendor representatives as needed to determine how to run the appropriate reports that generate this data.

Student Helpers

- While it is excellent that the SFA welcomes student helpers, the incentive for student helpers should be re-evaluated. Student helpers are currently incentivized via a free meal. If all student helpers get a free lunch, this is not necessarily fair to students that normally receive free meals since they are not really being compensated above what they normally receive at lunch. The paid eligible students receiving a free meal after working would essentially be earning something of a \$2.50 or \$2.70 value to them, but the free eligible student would be earning something of \$0.00 value to them since they normally receive free lunch regardless of their help in the kitchen. The same logic applies to students eligible for reduced priced meals.

- The most preferred way to compensate student helpers is by providing a wage. If a wage is not desirable or possible, an alternative incentive could be implemented or helping could simply be offered as a volunteer opportunity.
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2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Thank you to the Food Service Director and school nutrition professionals at Kewaskum School District. The time and efforts spent preparing for and participating in the onsite review was appreciated. It is evident that everyone involved with the school meals programs at Kewaskum Elementary is dedicated to providing the best possible program for the students. The menus are visually appealing and the meals offered include a variety of choices at both breakfast and lunch. The addition of the Fun Lunch this year has been a great way to boost participation.
- The staff at Kewaskum Elementary showed great interactions with students during meal service on the day of meal observation. All meals observed were reimbursable, indicating the work that staff puts in to educate students on what they may select for a reimbursable meal. In addition, staff at Kewaskum Elementary showed great enthusiasm for decorating the cafeteria to create a fun and inviting environment for their students. Thank you for all that you do for the students of Kewaskum School District!

Technical Assistance:

Production Records

- The production records in use are missing a few requirements based on the “[Must Haves and Nice to Haves](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records)” list of production record requirements (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).
 - The Servings/Amount Prepared column should be split into two columns. One column should list the number of servings prepared and the other should list the amount prepared in purchase units. This modification was made during the onsite review.
 - Condiments and items added to the menu need planned serving sizes.

Cereals on Production Record

- Production records list “cereal” instead of the individual varieties. Each cereal variety should be listed separately on the production record with actual usage recorded for each variety offered. Alternatively, a cereal “recipe” may be developed by determining average usage by cereal type. With a recipe on file, you may then continue to document cereal usage a whole on the production record. You may use the guidance for creating a [milk recipe](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc), but substitute your cereal varieties for the milk varieties (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc>).

Crediting Discrepancies

- The crediting for some items was incorrect on the production records. This did not cause noncompliance with the meal pattern quantity requirements. Please update your production records to ensure accuracy.
 - The three varieties of PopTarts were credited as 2 oz eq grain on the production record. The crediting according the product formulation statements is as follows:
 - Frosted Strawberry PopTart (1 per pouch) credits as 1 oz eq grain
 - Frosted Fudge PopTart (1 per pouch) credits as 1.25 oz eq grain
 - Frosted Cinnamon PopTart (1 per pouch) credits as 1.25 oz eq grain

- The Egg Lollipop credits as 1.75 oz eq meat/meat alternate according to the product formulation statement. The production record lists this as 2 oz eq meat/meat alternate and 2 items at breakfast. This item should be planned as 1 item based on the crediting.
- The Grilled Cheese Sandwich credits as 1 oz eq meat/meat alternate. The crediting on the recipe is accurate, but the production record credits the sandwich as 2 oz eq meat/meat alternate.
- The 4 fl oz spoodle used to serve the Turkey & Gravy credits as 2.5 oz eq meat/meat alternate.
- The ½ cup serving size of the reconstituted tomato soup credits as 1/8 cup red/orange vegetable, using the *Food Buying Guide* and the product formulation statement from the manufacturer. The soup may be counted toward the ½ cup fruit, vegetable, or combination Offer versus Serve requirement, but additional fruits or vegetables must be selected to fulfill the full ½ cup requirement.

Meeting Requirements when Offering Multiple Entree Options

- The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entrée option, each entrée option offered is viewed as one “line” and therefore needs to meet the daily as well as the weekly requirements. This guidance can be found in the following documents:
 - [DPI's Lunch in a Nutshell](#)
 - Each serving line must meet the daily and weekly requirements, including vegetable subgroups, independently. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>).
 - [Memo SP 10-2012 \(v.9\) Questions & Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”](#)(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf>).
 - Question #2: When multiple serving lines are used in a school, must each line meet the weekly vegetable subgroup requirement?
Yes, in most cafeteria set-ups. As required in [Section 210.10\(k\)\(2\)](#), each independent line must meet the daily and weekly requirements (including subgroups), in order to ensure that a child is able to take a reimbursable meal every day in any line they may choose. (pg. 37)
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf>).

Carrot Quantity in the Fun Lunch

- The recipe for the Fun Lunch specifies that ¾ cup of carrots are to be included with each bagged meal. However, on the day of lunch observation, the serving size of carrots appeared to be less than ¾ cup. One serving of carrots was diced and filled a ½-cup measuring cup. This was corrected prior to service by offering extra ½-cup portions of carrots with the Fun Lunch. All students were offered at least ¾ cup vegetables for the entire lunch service.

Water on the Breakfast Signage

- The breakfast signage was impressive! It clearly explained what students may select for a reimbursable breakfast and provided examples of reimbursable meals. However, water and bottled smoothies were included on the signage as items for a la carte purchase. Meal signage may not promote beverages other than the milk that is offered as part of the reimbursable meal. In discussion with staff at Kewaskum Elementary, it was determined that those items were not actually available for purchase at breakfast. Breakfast signage should be updated to reflect this.

Social Media

- Kewaskum School District is offering their students great breakfast and lunch programs! Please share photos of your meals, decorations, and events with the DPI School Nutrition Team for posting on our social media accounts. Visit the [School Nutrition Programs](https://dpi.wi.gov/school-nutrition) webpage and look for the “share” button on the right side of the page (<https://dpi.wi.gov/school-nutrition>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding C:** Pre-bagged carrots are included with the Fun Lunch daily. Students selecting the Fun Lunch do not have access to the vegetables offered in the serving line. Since students may select this meal daily, the Fun Lunch does not meet the weekly vegetable subgroup requirements. This resulted in missing dark green, beans/peas (legumes), starchy, and other vegetable subgroups at lunch during the week of review.

Corrective Action Needed for Finding C: Submit a written plan that includes the specific vegetables and planned serving sizes to be offered over the week with the Fun Lunch. Please also submit recipes, as applicable, and product documentation for all products added other than fresh vegetables.

Repeat violations of a missing vegetable subgroup during subsequent Administrative Reviews may result in fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance:

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other.” Only expenses for edible food items and beverages should be reported under “Food.”
 - “Equipment” should reflect major purchases of equipment costing over \$5000 per unit. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other.”
 - Under “Purchases Services” report any time someone is paid for services provided such as equipment repair and health inspections.
 - Under “nonprogram foods,” report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.

Allowable Costs

- Allowable costs for the nonprofit school food service account are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be

found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found on Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- While the SFA's unpaid meal charge policy is detailed and meets requirements, it is recommended to update the policy in the future to better clarify that free-eligible students will never be denied a meal regardless of their account balance. This can be deduced from the policy as it is written, however this point could be made clearer with language revision.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ✓ **Finding D:** The annual financial report has some expenditures allocated incorrectly. The equipment category of expenditures currently includes paper products, cleaning supplies, and expendable equipment which should be allocated as "other" expenditures. Further, some expenditure categories do not have allocation amounts for each program.

Corrective Action for Finding D: Please resubmit the annual financial report electronically. The modified report must reallocate equipment expenditures improperly categorized as "equipment," into the correct category of "other." Additionally, the report modification process must include a review of the allocation of each category of expenditures by program. *Corrected on-site; no further action required.*

- ❑ **Finding E:** The non-profit food service account was charged approximately \$100,000 towards the updates to the middle and high school cafeterias. This amount was charged to food service in the form of Fund 50 directly paying the invoice for all new cafeteria tables. Because the tables are used for more purposes in the school outside of food service, this is technically an unallowable cost. However, the cafeteria update project involved purchasing numerous pieces of expendable and nonexpendable equipment that would be allowable costs to food service. These other items were purchased directly with funds outside of Fund 50 and were not charged directly to Fund 50.

Corrective Action for Finding E: Review invoices for items purchased for the cafeteria updates. Select several expendable and/or nonexpendable equipment purchases that add up to at least the amount charged to Fund 50 for the tables. It must be documented that the amount charged to Fund 50 for this project contributed to allowable expenses. Be sure that the purchases selected are on the [equipment preapproval list](#). Submit a copy of the general ledger showing the amount food service was charged for the tables, and submit invoices for several expendable and/or nonexpendable equipment purchases related to the project that add up to the amount actually charged to food service for the tables. For the 2019-20 annual financial report, the expenditures for the selected expendable and/or nonexpendable allowable purchases must be allocated into "equipment" or "other," and then further allocated by program.

Revenue from Non-Program Foods

Commendations:

- The food service director did an excellent job completing the non-program foods revenue tool. While there were several minor errors noted in the tool, the outcome of the corrected tool indicated that the SFA is in compliance with the non-program foods revenue requirements.

- The catering offered through the food service department seems to be well-established and financially managed. The accountability procedures used for catering appear reliable and the catering services are priced appropriately to cover all associated costs.

Technical Assistance:

- There were a few minor errors noted in the non-program foods revenue tool, however these errors did not affect the compliance outcome. Please note:
 - The raw food cost for student reimbursable meals should be the same as for the equivalent adult meal since students and adults are offered the same meal.
 - The adult meal selling prices recorded must reflect the actual prices charged to adults at the POS.
 - The reimbursement column in the bottom program food section of the tool should not include state reimbursements received.
 - The most preferred way to account for USDA Foods when completing the tool is to calculate the raw food cost based on the market value of the meal as if USDA Foods entitlements were not included. Additionally, it is best not to include the \$0.23 USDA Foods value in the reimbursement column in the bottom program food section. The tool will yield the most favorable results if it completed according to these guidelines.
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4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. See corrective action below.

Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service of the state agency within 5 days. This should be included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](#) resource.

Special Dietary Needs

- The special dietary needs procedures in the SFA are compliant, and the staff members put forth great efforts to accommodate all special dietary requests. Accommodations made outside of meal pattern must be supported by a signed medical statement from a licensed medical practitioner. Accommodations made within the meal pattern do not need support from a signed medical

statement. However, signed medical statements are highly encouraged for all special dietary needs requests. If the SFA wishes to modify their special dietary needs procedures in the future, it is advisable to update the written procedures in the board policies and notify all households of any changes.

Resources:

- Additional information on [special dietary needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>).

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding F:** The CACFP civil rights training presentation was used to train staff members instead of the [NSLP civil rights training for front line staff](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>).

Corrective Action for Finding F: Submit a plan describing how it will be ensured that the correct training presentation is used in the future.

- ❑ **Finding G:** Two non-nutrition staff members with cashier responsibilities have not completed the required school nutrition Civil Rights training for the current school year.

Corrective Action for Finding G: Have the staff members complete the required Civil Rights training and provide a copy of the sign off sheet showing they have completed the training.

Local Wellness Policy (LWP)

Commendations:

- The SFA has shown dedication and great effort in establishing a wellness policy. It is clear that the SFA is committed to creating goals for district wide wellness.

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/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources).
- Additionally, the SFA is required to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Resources:

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

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding H:** The wellness policy did not contain required language pertaining to food and beverage marketing.

Corrective Action for Finding H: Submit a plan and timeline describing how and when the policy will be updated to include language about food and beverage marketing.

Smart Snacks in Schools

Technical Assistance:

- At the time of the on-site review only a la carte juice and milk were sold at Kewaskum Elementary. If any additional 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. 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).

Professional Standards

Commendations:

- The food service director does a great job providing training opportunities for food service staff members. The professional standards tracking tool was kept up to date and was well organized. It was also noted that most staff members are actively involved with the School Nutrition Association (SNA).

Technical Assistance:

Annual Training Requirements

- All school nutrition staff members have not yet completed their full amount of required training hours for the current school year. However, there are upcoming trainings and SNA meetings planned that will allow all staff members to earn their full amount of training hours.
- The training requirements by staff position are as follows:
 - 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, 2019 or later, only half of the training hours are required during the first school year of employment.
- The [Professional Standards Training Requirements chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) on the Professional Standards webpage explains in detail the training requirements for various job duties, including non-nutrition staff members with program duties such as cashiering during meal service (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf).

Findings and Corrective Action Needed: Professional Standards

- ❑ **Finding I:** The duties for two non-nutrition staff members with cashier responsibilities requires four hours of continued training per year, including training related to their specific job responsibilities. The required Civil Rights training can be included in the four hours. The training must be monitored on a tracker tool.

Corrective Action for Finding I: Please begin tracking professional standards training hours for these two staff members. Provide a copy of the training trackers, including documentation that training related to their job responsibilities was provided.

Food Safety

Commendations:

- The elementary school staff were clearly knowledgeable about food safety. The kitchen was extremely clean and organized. The food safety documentation reviewed was readily available, thorough, organized, and reflected daily attention to serving safe food to students.

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.

Findings and Corrective Action Needed: Food Safety

- ❑ **Finding J:** A standard operating procedure (SOP) for field trip meals was missing from the food safety plan at the reviewed site.

Corrective Action for Finding J: 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>).

Buy American

Technical Assistance:

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs.
- If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can accepted within an email.
- 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 the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- The following information must be recorded on a Buy American Non-Compliant Product List:
 1. Date
 2. Name of product
 3. Country of origin
 4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product
 - e. Distribution- record the reason the distributor carries the non-domestic product
 - f. Other- explain

5. Any other additional information found to be beneficial

Findings and Corrective Action Needed: Buy American

- ❑ **Finding K:** Caribbean Blend vegetables (product of Mexico) were found onsite and were not included on the SFA's non-compliant product list. Additionally, the date that you receive non-domestic products and the country of origin should also be added to your non-compliant product tracking form.

Corrective Action Needed for Finding K: Submit a copy of your updated non-compliant product list showing that all items include a date and country of origin, as well as the addition of the Caribbean Blend vegetables.

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 Kewaskum 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: L** 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 for Finding L: 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.

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!