

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

School Food Authority: Menasha Joint School District
School(s) Reviewed: Banta Elementary School, Menasha High School

Agency Code: 703430
Review Date(s): 2/18/19–2/20/19
Date of Exit Conference: 2/20/19

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

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

General Program Reminders/Updates:

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Menasha Joint School District for the courtesies extended during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to

respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. Many staff members were present at the entrance and exit conferences which indicated the team-focus of the district and care taken district-wide to implement successful Child Nutrition Programs.

The staff members did an excellent job preparing for the review, and were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the nutrition programs. The food service staff were welcoming, knowledgeable, and clearly dedicated to their work. The cafeterias were inviting and interactions between staff and students during meal times were positive and customer-service focused.

The collaboration observed between the district's authorized representative/director of business services and the food service director from the food service management company was positive and team-focused. It was clear that the two staff members work closely to ensure the programs operate effectively.

The district offers many innovative service models including a coffee shop with "grab and go" options, breakfast in the classroom, and varied menu options. The menus were interesting and even the elementary students were offered multiple entrees each day. The food service director recently began utilizing a colored bracelet system for elementary students to assist in entrée forecasting and selection. When observed, this colored bracelet method appeared effective and helpful in ensuring students choose their entrées in advance and stick to their decision. Great job developing the programs and introducing new ideas!

Farm to School is valued in the district. The SFA uses an aquaponics system to grow lettuce and other greens that are used in the meal programs. The hydroponic farm is used as an interactive teaching tool and produces nutritious foods that are served during meals. Additionally, there are numerous from-scratch food items made by the food service department. It is awesome to see the SFA offer these fresh menu items to students!

The SFA offers many meal programs to ensure that the students receive adequate nutrition and access to healthy meals. The district offers breakfast, lunch, supper, milk programs, Fresh Fruit and Vegetable Program, and summer meals. It is clear that staff members are dedicated to feeding children throughout the day and throughout the year. Excellent job managing an array of programs to meet the needs of students and the community!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Of the 525 eligibility determinations reviewed, eight errors were identified. These errors have been recorded on the SFA-1 form and were used to determine an error percentage. The error percentage was 1.5%, which is low enough to not require an independent review of applications or benefit issuance fiscal action. An additional six errors were identified outside of the benefits issuance sample. These errors have been recorded on the SFA-2 form and were not used to determine error percentages, but do require correction.

- The SFA primarily utilizes online applications that households can submit via the family portal. This appeared to be a highly effective means of establishing meal benefit eligibility while reducing paper load. Additionally, the SFA did a great job offering families many opportunities to complete applications and receive assistance, when needed.

Technical Assistance:

Paper Applications

- The SFA accepts paper applications and electronically submitted applications via the software system. The paper applications are manually entered into the software system by the determining official(s), and an equivalent online application is created. The paper applications are then retained per recordkeeping requirements.
- During the review, there were multiple instances when information on a paper application was not correctly entered into the software system. See corrective action below.
- When paper applications are manually entered into the software system, the determining official(s) must take care to ensure the information is entered exactly as it appears on the submitted application. Particular attention must be paid to the household members names and number of household members reported in the box in Part G. The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.
- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Reducing Paper Usage for Household Communications

- The SFA currently allows households to submit applications on paper, or online via the software system. There are some ways the SFA could work towards reducing the paper load of communicating with households about free/reduced meal benefits while adhering to regulations.
 - To inform families about the availability of free and reduced price meals, SFAs must distribute information letters to households of children attending the school before the children begin attending school (page 10 of 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>). Information letter requirements are detailed on pages 11-13.
 - The DPI SNT "[FAQ About Free and Reduced Price School Meals](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-app-parent-letter-faq-1819.docx)" letter is intended to serve as the information letter described in the Eligibility Manual (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-app-parent-letter-faq-1819.docx>).
 - This information/FAQ letter must be distributed to all households that are not already certified for free meal benefits via direct certification (DC) prior to the start of the school year. The SFA may choose to send the information/FAQ letter to all households, even if the households are already certified for free benefits via DC. Households certified for free meal benefits via DC prior to the start of the school year do not need to be sent the information/FAQ letter or an application, however they must be sent an appropriate notification of their approval for benefits via DC (i.e. the DC notification letter).
 - The information/FAQ letter can be sent via mail, email, or in student packets (if the packets are given to all students and are not an optional item). If sending electronically, an attachment or link to the full information/FAQ letter is allowable to meet this requirement.

- When distributing the information/FAQ letter, it must be ensured that all households required to receive the letter do indeed receive it. If utilizing email to distribute the information/FAQ letter, the SFA should have the ability to track any email bounce-backs and determine which households do not have email. If email will be the only way the SFA sends out the letter, it would be a best practice to send households without email a paper copy of the information/FAQ letter.
- If mail will be used to distribute the required information/FAQ letter, it may also be advisable to send a paper copy of the application and the [Instructions/How to Apply](#) along with the letter to promote application completion (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-meal-application-instructions-1819.doc.docx>).
- If the SFA chooses to only send the information/FAQ letter out to households, then the full three-part application packet (including the information/FAQ letter, the application, and the Instructions/How to Apply) should be available online and in paper copies upon request. The application form itself does not need to be physically mailed to each household, but households do need to know how to access the application online and where they can access a paper copy if they do not have the ability to access it online. The information/FAQ letter may need to be modified so that it accurately communicates how households can obtain an application.

Mid-Year Outreach

- The SFA expressed interest in sending out mid-year notifications to households to encourage free/reduced meal application submission in order to get the maximum number of students qualified for benefits. Communications encouraging families to apply for benefits must be distributed equitably, and may not target households that the SFA thinks might be eligible or were eligible in previous year. It would be appropriate for the SFA to send out mid-year reminders about applying for benefits to households not currently certified for any benefits (i.e. paid status). It is not advisable to send the mid-year reminders to free or reduced certified households, as this may create confusion since benefits are already being received.

Direct Certification Classification

- When communication with officials from Other Source Categorically Eligible Programs, such as the district's homeless liaison, establishes eligibility for meal benefits this is considered "direct certification for other source categorically eligible programs." For example, when the determining official receives emails from the homeless liaison notifying that specific students are homeless and thus eligible for free meals, these students are then considered directly certified and their effective date of eligibility can begin on the day the determining official receives the information. For additional information, reference the [Eligibility Manual](#) pages 14-20 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Direct Certification (DC) Runs

- While the determining official runs DC frequently, most of the runs are partial runs. It is recommended to conduct more frequent full DC runs (i.e. monthly) to ensure information obtained is the most thorough and accurate available.

Application Denial Letters

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

- Please reference the [DPI Approval/Denial template letter](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/letter-to-households.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/letter-to-households.doc>).

Transferring Students

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

Disclosure

- The SFA does an excellent job with sharing of information and disclosure. Via the electronic application or supplemental form with a paper application, households are able to indicate the individual purposes they consent to having their free/reduced information shared. Disclosure agreements are kept on file for all district staff that receive individual free/reduced information for non-program purposes. Keep up the good work handling disclosure!
- While it is not necessary to have district staff members complete disclosure agreements on an annual basis, it could be beneficial to review disclosure requirements annually, such as at a back-to-school meeting, for a refresher. New disclosure agreements should be signed for staff with duties that require it and do not already have one on file, or when updates are made to the agreement content.
- When a student transfers out of the district, the SFA could choose to include a copy of the household's free/reduced eligibility information (if applicable) in the student records packet sent to the new school. However, this information can only be shared for program purposes, which means that the school the student is transferring into must be participating in the National School Lunch Program (NSLP) for the information to be shared. If the new school/district is not part of NSLP, then the free/reduced information could not be shared, as this would then be a non-program purpose. Additionally, to ensure the free/reduced information is only shared with the staff member at the new school responsible for benefits issuance within NSLP, the information should be sealed in a separate envelope designated for the appropriate staff person at the new school or otherwise safeguarded.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding A:** One denied application reviewed was incorrectly denied when it was submitted in the early fall. The household submitted a paper application with an eligible assistance program case number and income information. When the application was entered into the software system by a determining official, the case number was not entered and the application was denied based on income alone.

Corrective Action: This household was matched to direct certification (DC) in December and became free eligible. Because the DC match established the free benefit that the household should have been receiving because of the case number, there is not further corrective action required. However, the district may consider refunding the household for meals purchased during the time period when the

household was incorrectly categorized as Paid. If a refund is pursued, the funds would need to be from a non-federal funding source (not Fund 50) unless previous claims for reimbursement are amended. *Corrected on-site; no further action required.*

- ❑ **Finding B:** During the review, there were multiple instances when information on a paper application was not correctly entered into the software system. In some cases, the issue was a missing or duplicated income. In many cases, there was inconsistent household member information. Some paper applications contained conflicting or missing household member information that was not properly clarified with the household prior to entry into the software system. When some paper applications were entered electronically, the electronic application generated pulled in other household members from the student information system that were not on the original submitted paper application.

Correction Action: Utilize the error log spreadsheet provided by the consultant to contact households and clarify unclear or conflicting application information. Based on the information obtained from households, update the electronic applications. Make notations, initial, and date the corresponding paper applications as a means to track the household communications. If household clarifications result in a change in benefit status, the appropriate communication letter must be sent out to the household. An increase in benefits would require the Increase in Benefits letter to be sent and the benefit would need to be changed in the software system within three days. A decrease in benefits would require the Adverse Action letter to be sent and the benefit would need to be changed in the software system after 10 calendar days (but not sooner as the household must be given 10 days to file an appeal, if desired). Notify the consultant how each error was resolved, including the date of resolution. Please provide copies of any letters sent to households in instances of benefit changes.

Verification

Technical Assistance:

Verification Pool and Sample

- In Section 4 of the Verification Collection Report (VCR), 297 applications were listed as approved as of October 1. Section 4 information was generated via a report in the software system and entered by the verifying official. Based on this information, nine applications should have been verified ($297 \times 0.03 = 8.91$, rounded up to 9). However, a different report generated in the software system indicated that 304 applications were on file as of October 1 and that 10 applications should have been verified. In Section 5-5 of the VCR, 10 applications are listed as selected for the verification sample. This inconsistency between the two different reports should be further investigated via communications with the software vendor. Repeated inconsistencies between the software-generated reports could lead to future incorrect verification sample selection.

Standard Sample for Non-Response

- The SFA had a 50% non-response rate for verification during 2018-19. Non-response rates greater than 20% require that SFAs use the standard sample (as opposed to alternate one or alternate two) for verification in the next school year. A formal letter from DPI SNT will advise of this requirement in the upcoming months.

Confirmation Review

- The Eligibility Manual states that confirmation reviews during verification may be waived if the local educational agency (LEA) uses a technology-based system with a high level of accuracy in processing an initial eligibility determination and that the LEA must contact the state agency to determine if the system qualifies for this waiver. The district has not requested or had approved such a waiver from DPI. The software vendor has been approved by DPI for web-based applications, however this does not automatically qualify the LEA for the confirmation review

waiver. A confirmation review is required during the verification process, particularly because the LEA does have a portion of applications that households submit on paper that are manually entered into the software by a district staff member.

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

Findings and Corrective Action Needed: Verification

- ❑ **Finding C:** The SFA did not adequately complete and document confirmation reviews for applications selected for verification, as described in the technical assistance section above.

Corrective Action: Submit a statement detailing how confirmation reviews will be completed in future school years. Please be specific regarding who will have confirming official duties, and how the confirmation review will be documented upon completion.

Meal Counting and Claiming

Technical Assistance:

Visiting Students

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

Claim Validation

- During claim validation, it was noted that one free breakfast was over-claimed at one school. While this is a minor non-systemic error, it has been recorded and is subject to fiscal action. This error was the result of a typo and not due to improper claiming procedures.
- On claims, the number of operating days should reflect the number of days that meal was served at the given school. There was one day in the review period when the middle and high school were not offered NSLP due to a half day schedule. However, this day was counted as an operating day for the two sites on the lunch claim. It is crucial that the number of operating days is correctly reported so that the internal claiming edit checks function properly.

Severe Need Breakfast (SNB) Qualification

- Review of the supporting documentation for severe need breakfast qualification revealed that 2015-16 data was incorrectly entered on the 2018-19 contract for SNB qualification. Data from 2016-17 should have been entered into the 18-19 contract for SNB qualification. Review of the 2016-17 data indicated that all schools did qualify for SNB, despite the incorrect data entry on the contract.

Findings and Corrective Action Needed: Counting and Claiming

- ❑ **Finding D:** Incorrect data was entered on the 2018-19 contract for SNB qualification. The data was from the third preceding school year, instead of the second preceding year as required.

Corrective Action: Submit a statement describing how SNB data will be correctly reported for the 2019-20 school year.

- ❑ **Finding E:** Operating days were not correctly reported on the December 2018 lunch claim for the middle and high school. Each school had a lunch operating day reported on which lunch was not actually served at the respective school due to a half-day schedule.

Corrective Action: Submit a statement of understanding that operating days reported on the claims must reflect the actual number of serving days for each meal at each school.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Thank you to the food service director, school nutrition professionals, and staff at Menasha School District. The time and efforts spent preparing for and participating in the on-site review were much appreciated. All documentation submitted for the week of review was thorough and organized and all staff members were welcoming.
- At Banta Elementary, the food service staff have worked with teachers to ensure breakfast in the classroom is executed. Implementing the different colored bracelets for each of the daily entrée options at lunch is a clever way to help students remember which choice they requested that morning. The posted photos showing students what a full, level spoodle looks like is also a great way to communicate portion sizes to students.
- The commons and service areas at Menasha High School were open and inviting and students had many options to choose from when selecting reimbursable meals. It is clear that staff considers the needs and preferences of the students in menu planning and with the service setup. Additionally, taking the time to make condiments in-house and maintain the hydroponic towers and bed to grow salad greens shows the department's dedication to the school community. Thank you for all that you do for the students of Menasha Joint School District!

Technical Assistance:

Production Records

- Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. The production records in use are thorough and clear, but a few improvements could be made.
 - A few extra fruits and vegetables were written in on the production records submitted for the week of review at Banta Elementary. Be sure to include the planned serving size with these items so that they may be credited toward the appropriate component and vegetable subgroup.
 - The "quantity prepared" column should give the total quantity prepared in purchase units, such as bags, boxes, cases, etc.
 - Peas were offered at lunch on Friday during the week of review at Banta Elementary. The production record showed two lines for the peas, with a ½ cup planned serving size for each, with one crossed out. In discussion with staff, it was stated that Webtrition only has a ½ cup serving size option for the peas, so it is put on the production record twice to indicate that the full ¾ cup must be offered. Technical assistance was provided to record the actual planned serving size on the site's production record in these cases to clearly indicate the quantity that was actually offered to students.

- A list of production record requirements (“[Must Haves and Nice to Haves](#)”) can be found on the [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

Crediting and Product Discrepancies

- The production records and standardized recipes submitted for the week of review contained a few discrepancies.
 - The recipe for the classic hamburger offered at Banta Elementary on 12/5/18 calls for a 2.5 oz Advance Pierre beef patty, but documentation for a 2.17 oz JTM beef patty was sent and offered during the week of review. This recipe should be updated to reflect the actual beef patty used.
 - The recipe for the hash brown patty offered at Banta Elementary on 12/6/18 calls for a 2.25 oz Lamb Weston patty. Both a photo of an Ore-Ida box and crediting documentation for a Lamb Weston patty was provided. Both products credit as intended, but the recipe should be updated to reflect the actual product used.
 - The recipe for the pretzel offered at Banta Elementary on 12/7/18 calls for a J&J Snack Foods brand pretzel. A Sysco brand pretzel was offered instead, which is not a whole grain-rich product.
 - The vegetable crediting for pork taco meat offered at Banta Elementary on 12/4/18 is incorrect on the production record. The $\frac{3}{8}$ cup planned serving size provides $\frac{1}{8}$ of red/orange vegetable, not $\frac{1}{4}$ cup.
 - The 2 oz serving of Casa Solana tortilla chips offered at Banta Elementary on 12/4/18 credits as 2 oz eq grain, according to the product formulation statement. This serving size was listed as crediting as 2.25 oz eq on the production record.
 - Based on the weight of the hardboiled egg offered with the salads at Menasha High School, this item credits as 1.5 oz eq meat/meat alternate (M/MA). It is credited as 1.75 oz eq on the production records. The manufacturer’s statement that this hardboiled egg credits as 1.75 oz eq M/MA is not a true product formulation statement and does not show how this crediting was calculated.

Standardized Measurements

- All foods offered as part of a reimbursable meal must have a standardized weight or measurement in menu planning and in service. Even foods that are not intended to credit toward the meal pattern still contribute to the dietary specifications and should be served according to the planned serving size.
- On the day of on-site lunch observation at Menasha High School, the shredded cheese and vegetables offered in the deli line were not being served with measuring utensils. The vegetables on the sandwiches are not being used to satisfy the students’ $\frac{1}{2}$ cup fruit, vegetable, or combination requirement for a reimbursable meal. It was stated that students only receive a small sprinkle of shredded cheese when they select at least 2 oz eq of other M/MA options on their sandwich as a customer satisfaction practice and as a way to stay within the dietary specifications. No students were observed taking cheese as their only M/MA.
- Staff should have the appropriate standardized measuring utensils on the line or establish a visual reference for the planned serving size prior to service.
- Weighing or measuring foods is especially necessary when they are intended to credit toward the meal pattern to ensure students are being offered reimbursable meals.
- As discussed on-site, some of the weights or measures called for on the standardized recipes are not realistic for actual service, such as measuring out sliced cucumbers with a tablespoon. It may benefit the staff to create reference sheets to translate these measurements or weights into the form in which the food is actually served. For example, three cucumber slices instead of 1 tablespoon of sliced cucumber. For the customizable deli and salad lines, creating a reference sheet

containing the many M/MA combinations and serving sizes may also be of benefit and may increase efficiency.

Weight versus Volume

- As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). The fact that spoodles, which are used to measure volume, are often referred to as a “4 oz spoodle” for example, makes this somewhat confusing. A 4 oz or ½ cup spoodle is actually 4 fl oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly. See the chart below for a comparison of weight and measure.

	Measures	Measured In	Conversions	Tools Used
WEIGHT	Meat/meat alternates Grains	Ounces (oz) Grams (g) Kilograms (kg) Pounds (lb or #)	1 lb = 16 oz 1 oz = 28 g	Scale
VOLUME	Fruits Vegetables Milk	Fluid ounces (fl oz) Tablespoon (T or TBSP) Teaspoon (t or tsp) Cups (c) Pint (pt) Quart (qt) Gallon (gal) Liter (L)	3 tsp = 1 TBSP 16 TBSP = 1 c 1 c = 8 fl oz 1 pint = 2 c 1 quart = 2 pints 1 gallon = 4 quarts	Spoodles , measuring cups, measuring spoons, scoops, dishers, ladles

***WEIGHT AND VOLUME ARE NOT EQUAL OR INTERCHANGEABLE... OUNCES ≠ FLUID OUNCES**

Signage

- Posted signage indicates the offered components at each meal and tells students what they must select in order for their meal to count as reimbursable. However, the language included on the signs could be misleading to students. Consider changing the wording to indicate that students must select *at least* ½ cup fruit, vegetable, or combination and select at least two other full components from: fruits, vegetables, meat/meat alternates, grains, and milk. This signage did not appear to be limiting students from taking multiple fruits or vegetables during on-site lunch observation and staff stated that fruit and vegetable quantities are not limited per student. 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).
- Having examples of how students may build a reimbursable meal on the posted signage is an excellent idea. However, some signs at Menasha High School included examples with incorrect quantity requirements for the 9-12 grade group. These signs showed that students could create a reimbursable meal by selecting ½ cup fruit, ½ cup vegetable, and a milk. Students in the 9-12 grade group could select ½ cup fruit or vegetable to fulfill the Offer versus Serve requirement, but the remaining components must be in the full daily-required amount. Therefore, the second fruit or vegetable selection would need to be the full 1 cup. This was updated prior to service.

Salad Bar Serving Sizes and Signage

- When the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. 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).

Granola Serving Size

- The recipe for the strawberry parfaits call for 1 cup of granola. Using documentation provided by the manufacturer, 1 cup of granola credits as 2 oz eq grain. However, using Exhibit A, 1 cup of granola would credit as 4 oz eq grain. Consider crediting the granola using Exhibit A and reducing the planned serving size to ½ cup. This may reduce food waste and better fit the dietary specifications.

Milk Variety for Breakfast in the Classroom

- A variety of milk (at least two allowable milk types) is required to be offered daily at lunch and breakfast. Only a few cartons of the second variety were included in the breakfast in the classroom delivery bins at Banta Elementary. Staff stated that usage is closely monitored and the delivery quantities are determined based upon student usage. The staff member preparing the breakfast deliveries on the day of breakfast observation was using a sheet containing this usage to stock the bins for each classroom. When the bins were returned after breakfast service, milk leftovers of both varieties were noted. Additionally, teachers and students have been informed that additional breakfast items may be requested from the cafeteria area, adjacent to the classrooms.
- Continue to monitor milk usage by type closely and adjust delivery amounts as needed to ensure all students have access to at least two milk varieties.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- Finding F:** There was a weekly grain shortage at lunch at Banta Elementary during the week of review. Only 7.75 oz eq grain were offered over the course of the week, which does not meet the minimum 8.0 oz. eq. grain requirement for the K-5 meal pattern. The menu and production record show that a whole grain-rich roll was planned for Friday, but was not offered.

Corrective Action: Submit a statement explaining how this weekly grain shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation. Submit a second statement explaining how menu changes will be addressed with staff to ensure the meals offered meet all meal pattern requirements.

- Finding G:** The sausage used on the pizza line at Menasha High School is not a creditable product, as the fat content exceeds the limit for creditable pork products. This resulted in a daily M/MA shortage on Monday during the week of review when the supreme pizza was offered and on Wednesday during the week of review when the meat lover's pizza was offered.

Corrective Action: Submit a statement explaining how the crediting for these two menu items will be corrected to meet the daily M/MA requirement for 9-12 students. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.

- Finding H:** There was a weekly M/MA shortage at Menasha High School during the week of review. Only 9.0 oz eq M/MA were offered over the course of the week, which does not meet the minimum 10.0 oz. eq. M/MA requirement for the 9-12 meal pattern.

Corrective Action: The corrective action for the daily M/MA shortages in Finding G will satisfy the corrective action needed for the weekly M/MA shortage.

- Finding I:** The recipe for the Caesar Chicken Salad offered at lunch on Friday during the week of review at Menasha High School contained a discrepancy in the amount of diced chicken to use. The ingredients section of the recipes called for 2.75 oz and the procedures section called for 2.8 oz.

When crediting the parmesan cheese included in the recipe, both amounts of chicken with the cheese met the daily M/MA requirement and did not result in a shortage.

Corrective Action: Submit a corrected recipe showing one amount of diced chicken in both the ingredient and procedures sections.

- ❑ **Finding J:** There was a daily grain shortage at lunch at Menasha High School on Tuesday, Wednesday, Thursday, and Friday during the week of review. The On the Go salads offered on these days were planned to be offered with croutons and a whole grain-rich dinner roll. The production records submitted for the week of review show that the dinner roll was crossed off and was not offered, resulting in students only being offered 1.25 oz eq grain from the croutons.

Corrective Action: Submit a statement explaining how these daily grain shortages will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation. Submit a second statement explaining how menu changes will be addressed with staff to ensure the meals offered meet all meal pattern requirements.

- ❑ **Finding K:** There was a weekly grain shortage at lunch at Menasha High School during the week of review. Only 7.0 oz eq grain were offered over the course of the week, which does not meet the minimum 10.0 oz. eq. grain requirement for the 9-12 meal pattern.

Corrective Action: The corrective action for the daily grain shortages in Finding J will satisfy the corrective action needed for the weekly grain shortage.

- ❑ **Finding L:** Every grain offered and credited as part of a reimbursable meal must be whole grain-rich, meaning 50% or more of the product needs to be whole grain. The following products offered during the week of review were not whole grain-rich:

- Pretzel offered at lunch at Banta Elementary
- Croutons offered at lunch at Menasha High School
- Sliced bread offered at the deli at lunch at Menasha High School

Corrective Action: Find new, whole grain-rich versions of these products or replace them with whole grain-rich products served on the existing menu. Submit nutrition facts labels, ingredient lists and recipes, if applicable.

Please note, through SY 2018-19 USDA, is requiring all grains to be whole grain-rich (50% whole grain). The [updated final rule](https://www.fns.usda.gov/school-meals/fr-113017) takes effect SY 2019-20 (https://www.fns.usda.gov/school-meals/fr-113017). Beginning in SY 2019-20, only half of the grains served must be whole-grain rich. While 50% of all grains are allowed to be non- whole grain-rich (i.e., enriched), this may undermine the progress made in the past few years in teaching students to accept whole grain-rich products.

- ❑ **Finding M:** The refried beans offered during lunch observation at Banta Elementary ran out prior to the end of lunch service. Students were still able to select corn for their vegetable component. The reviewer provided immediate technical assistance and requested that students be offered at least $\frac{3}{4}$ cup of corn, instead of the planned $\frac{1}{2}$ cup, to ensure students were offered enough vegetable to satisfy the daily requirement. It was noted that zero leftovers of the refried beans were recorded on the production record during the week of review.

Corrective Action: Submit a statement confirming understanding that K-5 students must be offered at least $\frac{3}{4}$ cup vegetable daily at lunch. Include a second statement explaining how this will be communicated to serving staff.

- ❑ **Finding N:** The Mixed Greens Salad with Cheese recipe for the On the Go salad offered on the day of lunch observation at Menasha High School calls for 2 oz (by weight) of shredded cheddar cheese.

During meal preparation, the staff member preparing the salad was initially using a 2 oz spoodle to portion the cheese. Technical assistance was provided on the difference between weight and volume. The staff member corrected this by weighing 2 oz of shredded cheddar. All the salads offered at lunch contained the daily minimum requirement of M/MA for 9-12 students. The procedure section of the recipe also contained a note stating that 2 oz of shredded cheese was about ½ cup. However, when weighing out the cheese, the staff member found that slightly more than ½ cup was needed to reach 2 oz by weight.

Corrective Action: Submit a statement explaining how staff will be trained on the difference between weight and volume when following recipes and serving meals. Consider updating the recipe to remove the ½ cup reference if this is found consistently not be accurate.

Repeat violations of component shortages during subsequent Administrative Reviews may result in fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance:

Annual Financial Report (AFR)

- As a reminder, the expenses that may be allocated as Purchased Services include, but are not limited to: equipment repair, pest control, garbage/recycling service, employee travel and/or training costs (registration fees, mileage costs, lodging costs, etc.), printing and copying expenditures, the management fee for a Food Service Management Company, and processing and handling charges for receiving USDA donated foods as they are considered a payment to the state.
- For SFSP:
 - If specific USDA Foods are received for use in SFSP, the entitlement value should be included as a revenue and expenditure for SFSP—just like for NSLP.
 - If the SFSP claim is combined for June and July, the reimbursement amounts must be manually broken out for each month and reported accordingly on the AFR. SFSP revenues and expenditures for June 2019 should be reported on the 18-19 AFR. SFSP revenues and expenditures for July 2019 (and for the rest of the summer 2019), should be reported on the 19-20 AFR.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding O:** The annual financial report (AFR) contained several items that appear to be errors. These items warrant investigation and correction.

- A large sum was allocated as Equipment for Non-Program Foods expenditures. This appears to include the full cost of the new walk-in freezer purchased for use in multiple programs.
- The balance for Non-Program Foods is negative. Non-Program Foods many not run in the negative, but this may be due to the Equipment allocation described above.
- The balance for Grants is negative by a significant amount. It appears that some food costs may have been inappropriately allocated as Grant expenditures, thus resulting in an erroneous negative balance.

Corrective Action: Investigate the errors and manually make any necessary corrections on a printed version of the AFR. Submit the manually updated report to the consultant via email.

Revenue from Non-Program Foods

Technical Assistance:

Non-Program Food Revenue Requirements

- Non-program foods include: adult meals, a la carte, extra entrees, extra milk (for cold lunch or milk purchased at milk break), vended meals (meals sold to other agencies), catering, and food service operated vending machines. Since non-program foods include adult meals and extra milk, these expenses and revenues must be separated from program foods.
- All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Non-program food costs and revenues must be separated from program food costs and revenues.
- The USDA Non-Program Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

Non-Program Foods Revenue Tool

- Both the program (bottom) and non-program foods (top) sections of the tool should use sales data from the same reference period. When entering the number of items sold for both program and non-program foods, the values should reflect the actual number of items sold district-wide for the entire reference period—not averages of items sold per day.
- Meals that food service staff receive free of charge as part of their work day do not need to be included in the tool as non-program foods. These meals are for “program adults” and are an allowable cost to food service, and thus are not subject to non-program food revenue requirements.
- Catering does not need to be included in the tool if it is infrequent, however the SFA may choose to include caterings occurring during the reference period if it is beneficial to do so.
- Adult lunches and breakfasts should have the same raw food cost as student lunches and breakfasts because the meals offered are the same for adults and students.
- When entering in the selling price for program foods, weighted averages must be used for the Paid meals.
- When entering in the USDA reimbursements, USDA Foods value (\$0.2350) and state aid should not be included.
- It is highly recommended that the SFA download a new tool from the Financial Management webpage when completing the corrective action below. The tool that the SFA completed prior to the review is not the most updated version.

Findings and Corrective Action Needed: Non-Program Foods Revenue

- ❑ **Finding P:** The [Non-program Foods Revenue Tool](#) was completed for the current school year to assess compliance with the revenue requirements, however it was completed incorrectly (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

❑ **Finding Q:** The adult meal prices advertised to staff members and charged at the POS do not match the prices listed on the online contract. The prices charged for adult lunches and breakfasts are compliant with minimum adult meal pricing requirements, however they must be accurately recorded on the contract. The dine-in adult lunch is \$3.75 and the delivery adult lunch is \$4.25 for the added delivery service. It would be most appropriate to list \$3.75 as the adult lunch price on the contract in order to show that minimum adult lunch prices are being met.

Corrective Action: Update the online contract to reflect the correct adult meal prices for both breakfast and lunch. Once completed, please email the consultant assigned to the contract and copy the consultant that conducted the review.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

And Justice For All Poster

- The *And Justice For All* poster must be displayed in a prominent location and be visible to program participants. At Banta Elementary, the poster displayed was posted well above student eye level. It is recommended to relocate the poster to a lower level so that it is readable by program participants.

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. Documentation, such as a sign-in roster, is needed to track who completed the training. While the SFA did have training sign-in rosters, there were several food service staff names missing from the rosters. The person responsible for managing the training confirmed that each person attended, however the sign-in sheet did not adequately document each person's presence at the training. Please continue working with staff to ensure that training is completed and documented. Emphasizing that training may need to be repeated for anyone who does not sign in could be a strategy to encourage more thorough tracking of completion.

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 or 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 SFA does an excellent job managing special dietary needs requests. All requirements are being met and the SFA's effort to make accommodations allows more children to participate in the meal programs. Great job!
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Local Wellness Policy (LWP)

Technical Assistance:

Documentation

- Documentation pertaining to the LWP should be kept on file in the SFA to show that requirements are being met. This includes a roster of stakeholders involved in the LWP development/implementation/revision, records of when and how the policy is revised, where the policy is available publicly, how potential stakeholders are notified of their ability to participate in the LWP, and any information pertaining to the assessment of the policy.

Wellness Committee

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP.
- The SFA had a committee of diverse stakeholders involved in the initial development of the policy several years ago, however since that time, only the food service director and director of business services/authorized representative have been involved with the LWP.
- It is strongly recommended that the SFA make efforts to re-vamp the original wellness committee and recruit additional stakeholders to obtain input from a diverse group, as is required by USDA.

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness policy (LWP) requirements. At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
 - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
 - Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
 - Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
 - Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
 - Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
 - Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating

- of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- o 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](#) 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 R:** The local wellness policy (LWP) does not contain adequate required language pertaining to foods provided but not sold, food and beverage marketing, nutrition promotion, and the triennial assessment. Additionally, it is recommended (though not required) to remove language referencing the USDA Dietary Guidelines in some areas of the LWP and in Policy 8500 when the language may not apply. In many instances it is more appropriate to reference the regulations in the *Healthy Hunger-Free Kids Act*.

Correction Action: Submit a timeline and detailed plan 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

Commendations:

- The a la carte selection of foods and beverages available to students at Menasha High School is impressive and provides them with additional options without having to leave the campus. The

online calculator is being used to determine compliance with the Smart Snacks standards and tracking systems are in place.

Technical Assistance:

- 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. The school day is considered the period from the midnight before to 30 minutes after the end of the instructional school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption.
- There are two situations by which an organization may sell foods and beverages to students during the school day.
 1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
 2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards:
 - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
 - b. Exempt fundraisers cannot occur in the meal service area during meal times.
 - c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. Be specific with the exact times the fundraisers are held, as “after school” does not specify if the fundraiser was held at least 30 minutes after the instructional day.
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times.
- The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.
- Accompaniments or dips need to be included in the nutritional analysis of foods sold a la carte. This may be assessed by determining the average amount each student uses, or by planning for a specific amount to go with each food item sold. The calories, sodium, fat, and sugar of the food plus the accompaniment need to be added together when determining whether the food meets the Smart Snacks guidelines. The Alliance for a Healthier Generation’s [Smart Snacks Product Calculator](#) or DPI’s Smart Snacks Recipe Analyzer Tool (found at the top of our Smart Snacks webpage) can be used to determine whether products are compliant. If they are, a reference sheet directly from the calculator website can be printed or an electronic or printed copy of the recipe analyzer tool can be kept on file as recordkeeping documentation.

Findings and Corrective Action Needed: Smart Snacks

- ❑ **Finding S:** The recipes submitted for the a la carte iced coffee with creamer and lemonade contained incorrect ingredient amounts that did not reflect the amounts actually used to prepare these items.

Corrective Action: Submit corrected recipes for these two items showing that they meet the Smart Snacks standards.

- ❑ **Finding T:** Currently, the PTO sells popcorn to students monthly during the school day as an exempt fundraiser at Butte des Morts Elementary. This does not meet the state-defined rules on exempt fundraisers. The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. Please note there are Smart Snack-compliant products that schools can sell – perhaps a viable solution if this is to continue.

Corrective Action: Submit a statement explaining what will be done with this popcorn sale to bring it into compliance with the Smart Snacks standards. Include who at the school will be responsible for ensuring compliance, as well as a timeframe in which this will be completed.

- ❑ **Finding U:** Students were observed with boxes of candy bars to sell to other students during lunch service in the commons area at Menasha High School on the day of review. It was stated that multiple students and student groups were selling the candy bars as fundraisers. This fundraiser did not appear on the exempt fundraiser tracking form submitted for the Administrative Review. Furthermore, all foods sold to students during meal service in the meal service location must be Smart Snacks compliant.

Corrective Action: Submit a statement explaining how Menasha High School will communicate the Smart Snacks regulations to student groups and include who will be responsible for this.

Professional Standards

Technical Assistance:

Director Role in FSMC Contracts

- In SFAs with FSMCs, the role of food service director is technically shared between the authorized representative and the FSMC food service director because the SFA retains ultimate responsibility for the school meal programs. For this reason, authorized representatives of SFAs under FSMC contracts will be required to complete 12 hours of annual professional standards training in upcoming school years. The authorized representative should begin seeking out opportunities for professional standards training and track trainings as they are completed. There will be future communications from DPI SNT on this topic as it begins to be enforced.

Findings and Corrective Action Needed: Professional Standards

- ❑ **Finding V:** The determining/verifying official primarily responsible for free/reduced benefits management, is considered a “part-time non-nutrition staff with duties related to nutrition programs.” For this reason, this staff member is subject to the four hour professional standards training requirement annually. Civil rights training must also be completed annually. While this staff member may have completed trainings throughout the year already, these professional standards training hours have not been tracked.

Corrective Action: Submit a training tracker for the determining/verifying official to reflect training hours completed thus far for the current school year. The [DPI training tracker](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) can be used if desired (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>).

Food Safety

Technical Assistance:

Employee Health Reporting Agreements

- It is highly recommended to have the student helpers that work in the kitchens complete Employee Health Reporting Agreements and receive any additional training necessary on this subject. Because these students are in contact with food and food-contact surfaces, it is crucial that they are aware of reportable illnesses and symptoms so that they can be appropriately excluded from working around food when sick.

HACCP Categorization

- The SFA currently has the HACCP process for each menu item indicated on the production records. It is highly recommended to have a master list of the HACCP process for each menu item included in each site's food safety plan.

Sharing Tables

- Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.
- A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.
- A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, a designated worker or trained individual must inspect the items for wholesomeness.
- Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.
- Considerations
 1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
 2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
 3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
 4. Parents will be informed in writing.
 5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
 6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
 7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
 8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

- Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. “Wholesome” must be defined by the SFA as part of the SOP. **Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.** Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.
- Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

Findings and Corrective Action Needed: Food Safety

- ❑ **Finding W:** The food safety plan at Banta Elementary did not contain a standard operating procedure (SOP) for FFVP. A [template FFVP SOP](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-ffvp.doc) is available on the Food Safety webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-ffvp.doc>). The food safety plan at the high school did not contain an SOP for milk barrels. A [template Use of Milk Barrels: Monitoring Temperature Option SOP](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-barrel-temperature.docx) is available as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-barrel-temperature.docx>). The “monitoring temperature option” would allow leftover, unserved milk in the milk barrels to be saved for future meal service if proper temperature monitoring is followed. Without proper temperature monitoring, the milk leftover in the barrels should not be saved for future service and time as a public health control procedures may apply.

Corrective Action: Develop site-specific SOPs for these practices at each school. Please be sure the SOPs are modified in a manner that reflects that actual practices at each school. Send the final SOPs to the consultant. Add the SOPs to the food safety plan binders at each school and provide training to staff as needed.

- ❑ **Finding X:** At Banta Elementary, unserved milk returned from breakfast in the classroom (BIC) is returned to the cooler for future service. The milk is not kept under temperature control during BIC service—it is simply placed in a bin on a cart. The milk temperature is not monitored and recorded upon return to the kitchen. This practice does not adhere to the established BIC SOP that is part of Banta’s food safety plan. Additionally, at lunch at Banta, cheese sticks are served off of a tray without temperature control. After meal service, any unserved cheese sticks are returned to the cooler for future service without any temperature monitoring or recording of temperatures. This practice does not adhere to the Time as a Public Health Control SOP in the food safety plan.

Corrective Action: Milk, cheese, and other dairy products are considered time/temperature control for safety (TCS) foods, and thus must be held under temperature control or be handled using time as a public health control procedures. Saving and re-servicing TCS foods held outside of temperature control is not allowable per the Wisconsin Food Code, although local enforcement by the sanitarian conducting food safety inspections may vary. Regardless of which option for serving TCS foods is used, a corresponding SOP must be included in the site-specific food safety plan and adhered to. Consider the following options to modify the current procedures:

1. Utilize time as a public health control (TPHC) procedures.
2. Utilize ice-lined milk bags, barrels, or containers so that temperature control is used, along with monitoring of temperatures.

3. Work with local regulatory authority/sanitarian to develop an alternative, approved method for re-serving milk and other TCS foods that have been held outside of temperature control during meal service.

Submit a statement describing how TCS food items held outside of temperature control during service will be handled going forward. It is recommended to consult with the local sanitarian to establish procedures for appropriately saving these leftover, unserved items. If any SOPs are updated or modified, please submit these as part of the corrective action. Communications with the sanitarian (if applicable) may also be submitted as part of corrective action.

Finding Y: During BIC observation at Banta, several classrooms were utilizing sharing bins for students to exchange unwanted, unopened prepackaged food items. This is considered a “sharing table,” and thus proper procedures must be in place or the sharing tables/bins must be discontinued. To continue using sharing bins, a sanitarian-approved SOP must be included in the food safety plan and the SOP must be followed by all staff overseeing the sharing bins.

Corrective Action: Immediately discontinue the sharing bins or develop an appropriate SOP and obtain sanitarian approval. Sanitarian approval may be in the form of email documentation, or a signature on the SOP. Submit completed and approved SOP or submit a statement describing how sharing bins will be discontinued.

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 and small local farmers, and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
 - If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can accepted within an email.
 - The label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
 - Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not

- pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
 - The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
 - There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
 - For domestic products without country of origin labeling (COOL), consider the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).
 - More information on this new requirement can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

- **Finding Z:** The following products were identified in the SFA's storage area as non-domestic and not documented:
 - Trio Poultry Gravy (Canada) -- *Corrected on-site; no further action required.*
 - Frozen Green Beans (Canada)

Corrective Action: Complete and submit a Non-Compliant Product Form for the frozen green beans.

Fresh Fruit and Vegetable Program (FFVP)

Commendations:

- Thank you for offering FFVP to the elementary school students. The program is a wonderful way to expose young children to a variety of fresh fruits and vegetables that they might otherwise not have a chance to taste.

Technical Assistance:

- Providing nutrition education helps create a healthier school environment and is critical to the success of FFVP. Nutrition education resources can be found on the [Promoting Fresh Fruits and Vegetables in Schools](https://dpi.wi.gov/school-nutrition/ffvp/promotion) webpage (<https://dpi.wi.gov/school-nutrition/ffvp/promotion>).
- In addition to promoting FFVP at the meet and greet at the beginning of the school year, consider promoting FFVP more throughout the year. This may be done in newsletters, websites, or social media.

Findings and Corrective Action Needed: Fresh Fruit and Vegetable Program

✓ There were no findings or corrective action needed for FFVP.

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

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

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

