

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

School Food Authority: Marshall School District

Agency Code: 13-3332

School(s) Reviewed: Marshall High School

Review Date(s): 11/27/17-11/28/17

Date of Exit Conference: 11/28/17

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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).
- 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.USA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USA.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:

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

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Technical Assistance (TA)

- 233 eligibility determinations were reviewed, 3 errors were identified. With minimal errors (<3% error rate), fiscal action will not be assessed. Great job!

Free and Reduced Price Meal Applications

- Staff reviewed and approved applications in a timely manner and eligibilities were properly determined. Incomes were properly reported and not converted to annual when unnecessary.
- Children are eligible for free or reduced price meal benefits on the date their application is determined complete and unambiguous by the Determining Official.
- Eligibility effective dates on the benefit issuance list should be the exact date of application approval, not the first day of school. This occurred when applications were submitted before the first day of school.
- Verify that the assistance program reported on the application qualify for free meals. The agency should follow up with the households to make sure programs reported are approved as categorically eligible programs. A complete Assistance Program case number application must provide:
 - names of the children for whom the application is made
 - a valid SNAP, TANF or FDPIR case number or identifier for the children or any household member listed on the application
 - the signature of the adult household member completing the application

Incomplete Applications

Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified 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.

Indication of No Income

Each household member must be listed on the application, even if they have no reportable income. Any income field left blank is a positive indication there is no income to report. When no income is provided for any of the adult household members, the application is still considered complete when signed. If local officials have knowledge or available information suggesting a household has intentionally misreported its income, including by leaving the income fields blank, the LEA must verify the household's application for cause [7 CFR 245.6a(c)(7)]. For more information, see *Verification for Cause* on page 99 of the [Eligibility Manual](#) for School Meal Programs.

Other Source Categorical

When an application includes a homeless, migrant, runaway, or Head Start student, it is required the agency follow up with the liaison for supporting documentation before the application can be

approved. In contrast, a foster student application can be taken at face value, but is then subject to verification.

Effective Date of Eligibility Flexibility

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

Public Release

- All SFAs are required to distribute a Public Release before the start of the school year. The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed. If you would like to pay to have the release published, it is an allowable cost to the food service account.

Limited English Proficiency (LEP)

Translated application materials and other communications were provided to households when necessary.

Direct Certification

- The effective eligibility date listed on the benefit issuance list for a DC eligible student is the date of the original output file.
- Foster 'E' code, cannot extend eligibility to other household members. Foster students are considered a household of one.
- Thank you for running the DC more often than the minimum number of occurrences required and within in the required time frames.

Independent Review of Applications

LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year. Marshall School District had a 1.29% certification error rate and does not have to conduct a second review of applications.

Disclosure

Thank you for following the disclosure procedures correctly.

Findings and Corrective Action Needed: Certification, Benefit Issuance, and Public Release

✓ **Finding #1:** Public Release not distributed to appropriate locations.

Corrective Action Needed: The public release needs to be distributed to Grassroots organizations, major employers contemplating or experiencing large layoffs, or Local Unemployment Offices. Submit a statement outlining where the release will be sent in the 1819 SY.

Corrected onsite. No further action needed.

✓ **Finding #2:** 3 benefit issuance and certification errors, which are indicated on the SFA-1 form.

1) Student A, not found as eligible on the direct certification list & incorrectly extended eligibility through 'E' code.

2) Student B and C application approved as reduced status, received free when entered to point of sale.

Corrective Action Needed: Send a letter of adverse action (decrease in meal benefits) to the households, notifying them of the review findings. Provide a full 10 *calendar* days for the household to appeal prior to changing their meal status in the point of sale system. If there is no response, the benefits change on the 11th calendar day. If the household appeals, continue the same meal benefit until the appeal is resolved. Encourage the household that is no longer eligible per DC to submit a Free and Reduced income application. Provide a copy of the letter of adverse action.

Corrected onsite. No further action needed.

✓ **Finding #3:** The F/R approval letter sent to households contains confusing/outdated language.

Corrective Action Needed: Edit the approval letter template to remove reference to "temporary benefit status" and "second meals".

Corrected onsite. No further action needed.

Verification

Commendations/Technical Assistance (TA)

- The Confirming Official only needs to check and sign-off on applications selected for verification. The confirmation review must be done *before* sending the "We Must Check your Application" letter.
- Benefit eligibility status increases and decreases were altered appropriately within the correct time frames. Notices of adverse action ("We have Checked" Your Application Letters) were also sent out with adequate details/information.
- One notice of adverse action was sent to a household past the verification process deadline. Consider sending reminders to households requesting supporting documentation for verification at an earlier point in the verification process and/or giving them a shorter timeframe to respond after the one required reminder. This would ensure the notices of adverse action are sent to households before the annual verification process deadline of November 15th.

Findings and Corrective Action Needed: Verification

✓ **Finding #1:** The online contract lists the wrong confirming official.

Corrective Action Needed: Update the online contract to reflect the correct person conducting the confirmation role. **Corrected onsite. No further action needed.**

❑ **Finding #2:** The number of applications selected for verification (sample size) during the 1718 SY was incorrect. The agency over-verified applications (5 vs. 4).

Corrective Action Needed: Submit a statement indicating that based on the pool of applications on file as of October 1, and sample size chosen, the agency will not over-verify applications.

Note: 'Verification for Cause' is separate from the annual Verification process and was not conducted by the agency.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The lunch and breakfast counting and claim for the Review Month was conducted perfectly. The Special Milk Program had one non-systemic math error (under-claim of 1 milk).
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.

Field Trip Point of Sale

Reviewer discussed sending a student roster or check-off sheet with the teachers/staff on the field trip. A supervising staff member would then check that a reimbursable meal was received at the point of sale and return the list to foodservice. Food service then uses this list (actual participation counts) to consolidate the monthly claim.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at Marshall High School for doing a wonderful job of serving healthy, appealing meals to students. Staff clearly enjoy good rapport with students, and this creates a pleasant atmosphere in the kitchen and cafeteria. Thank you to the food service director for sending meal pattern documentation prior to the on-site review, as this greatly reduced the amount of review time needed on-site.

Technical Assistance/Compliance Reminders

Crediting Croutons

The croutons that are offered as part of the salad bar entrée are pre-packaged in 0.5 oz bags. Per [Exhibit A](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf) of the USDA *Food Buying Guide*, 0.8 oz of croutons credits as 1 ounce equivalent (oz eq) grain (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf). Therefore, 0.5 oz of croutons credits as 0.5 oz eq grain. Students may also take two 1 oz eq dinner rolls with the salad bar entrée, so their daily grain requirement of 2 oz eq is offered. However, staff and students must know how the croutons credit in order to ensure that reimbursable meals are selected. If a student selects two packages of croutons as their only grain, they will only have 1 oz eq of grain, which does not count as a full component and therefore doesn't count as a component under Offer versus Serve (OVS). A student could select one roll and two packages of croutons to achieve their full grain component for OVS. Alternatively, you could switch to a different crouton product that weighs at least 0.8 oz per package.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ Finding #1: Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is

printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). Additionally, remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the [Meal Pattern Components](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>).

If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for School Meal Programs, it may not be credited when served as part of the USDA's Child Nutrition Programs. If this is the case for the products listed below, please find a replacement product to use instead that has either a CN label or PFS.

Corrective Action Needed: Please submit current and accurate CN labels or PFS for the following products:

- Grilled chicken breast fillets
- Egg patty

❑ **Finding #2:** At the time of the on-site review, standardized recipes were missing for several of the foods offered during the week of review. Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Corrective Action Needed: Please submit a standardized recipe for the following:

- Bacon cheeseburger
- French toast bake

❑ **Finding #3:** There was a daily grain shortage at the high school on Wednesday, October 18, 2017. The only grain offered on this day was ½ cup of brown rice (along with the tater tot nachos), which credits as 1 ounce equivalent (oz eq). Grades 9-12 must be offered 2 oz eq per day. See the [meal pattern tables](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables) for more information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables>).

Corrective Action Needed: Please submit a written statement explaining what you will add to the menu to offer 2 oz eq grain on the tater tot nacho day.

❑ **Finding #4:** Marshall High School offers a sack lunch for students going on field trips. Students can order their sack lunch via a form that they return to food service. The current order form offers all components, but not in required quantities. Students must be offered each component in the daily minimum requirement for their age/grade group. For grades 9-12, this includes 1 cup of fruit and 1 cup of vegetable. The current order form offers ½ cup fruit and ½ cup vegetable. The form should be redesigned to offer a full 1 cup of fruit and 1 cup of vegetable and also allow students to turn down components to meet the Offer versus Serve requirement. Students must select three full components including ½ cup of fruit and/or vegetable to have a reimbursable meal.

For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

Corrective Action Needed: Please submit an updated field trip lunch order form that shows that students are offered all components in their full daily quantities.

❑ Finding #5: Signage was not posted at breakfast or lunch to show students what constitutes a reimbursable meal. The National School Lunch Program regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at breakfast and lunch. Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage). If you are interested in ordering signage from SNT, please visit the [Team Nutrition](https://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

Additionally, it is recommended that you post signage on the salad bar to indicate to students what they are expected to take. It may be helpful to post a picture of a tray with the amount of lettuce (or other vegetables) that the menu planner expects the students to take. It might be helpful to have signage that indicates what is included with the salad bar entrée, since the grain and meat components of the entrée are located on the main line and not on the salad bar itself. It is also a best practice to include signage at the condiment station to encourage students to take reasonable portions of salad dressing and other condiments.

Corrective Action Needed: Please submit a photo of breakfast and lunch signage posted at the high school.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

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. The new 16-17 Annual Financial Report instructions are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

Unallowable Costs

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

Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a “Nutshell”

(<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning unclaimed property that must be followed <https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>. For more information see the new [WI Financial Q&A](#)—Unpaid Meal Charges section.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

✓ **Finding #1:** The adult lunch charge of \$3.45 which is listed within the online contract is not in compliance with the federal minimum pricing guidelines. Per onsite review, the agency is actually charging \$3.50 at the point of sale.

Corrective Action Needed: Update the online contract to accurately reflect \$3.50 as the adult lunch charge. **Corrected onsite. No further action needed.**

❑ **Finding #2:** The 1617 SY Annual Financial Report does not properly allocate revenue to nonprogram foods. Part of the operating transfer should be allocated to nonprogram food losses. In addition, any NSLP FSMC purchased service expenses should be broken out and reported under labor food, and other (supplies). A viands will need to provide you will this per meal breakdown based on the negotiated fixed meal rate.

Corrective Action Needed: Update the 1617 SY Annual Financial Report online-- if completed before the end of December. If corrected after December, the updates will need to be submitted manually via email attachment to the DPI accountant, jacqueline.jordee@dpi.wi.gov.

Paid Lunch Equity (PLE)

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram 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>).

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

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A Wisconsin Adult Meal Pricing Worksheet has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices for the 18-19SY.

Resources

- **Nonprogram Foods Revenue Rule SP-20-2016** (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- **Nonprogram Foods In a "Nutshell"** (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- ☐ **Finding:** The Nonprogram Foods Revenue Tool has not been completed for the current school year.

Corrective Action Needed: Watch the Nonprogram Foods Revenue Tool webinar and provide a copy of the completed quiz questions and a completed tool for Marshall School District using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

No issues were found regarding the Nondiscrimination statement on appropriate documentation.

And Justice for All Poster

Thank you for posting the "And Justice for All" poster in public view where the program is offered.

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.

Special Dietary Needs

Marshall School district works hard to collaborate with the nurse, parents, and students to best meet meal modification requests. Thank you! The below guidance is provided as a reminder:

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the prototype Medical Statement for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on 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 gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on fluid milk substitutes, please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

On-site Monitoring

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our Administrative Review webpage under the SFA

onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

Findings and Corrective Action Needed: Onsite Monitoring

❑ **Finding:** Onsite-monitoring was not completed at the High School (review site) for the 1617 SY.
Corrective Action Required: Submit a statement indicating the district will complete annual breakfast and lunch onsite monitoring reviews SFA-wide, before February 1 each year, as outlined in the above technical assistance section.

Food Service Management Company (FSMC)

The following duties may not be delegated to the FSMC:

- Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal claiming, plus other categories.
- Signature Authority – a representative of the SFA must sign off on the contracts for the SFA
- Edit Checks- an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software

Local Wellness Policy (LWP)

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Marshall School District updated the LWP in October, 2017 to better align with the requirements established by the Healthy Hunger-Free Kids Act final rule. The updated policy looks great and included a diverse committee, but will now need to be fully implemented, monitored, and evaluated.

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

The rule also requires the SFA to *inform and update the public* about the assessment of the implementation of LWP. **The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA’s LWP compares to a model policy.** SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the

public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Smart Snacks in Schools

Comments/Technical Assistance/Compliance Reminders

Food Service A la Carte

All foods and beverages sold a la carte by food service are compliant with the Smart Snacks guidelines. Smart Snacks Calculator printouts were provided for all a la carte items. Food service should be commended for keeping thorough and accurate Smart snacks documentation! A big thank you to the head cook at the high school for being a point person and source of information on Smart Snacks for others in the school.

Food Given Away

Unhealthy food that is given away or used as a reward does not support the healthy strides that the food service department has made in recent years. The entire school is a learning environment, and this extends to any foods or beverages that students are offered. The reimbursable meals demonstrate healthy portion sizes and a balanced diet, and unhealthy foods that are offered at other times during the day undermine the work of the food service department. In addition, Marshall School District's local wellness policy aims to limit celebrations and rewards that involve food during the school day, as well as encourage the use of non-food rewards. Consistent use of unhealthy food as rewards contradicts this wellness policy goal.

Findings and Corrective Action Needed: Smart Snacks

❑ **Finding #1:** Course Grounds is a student-run snack shop that is open in the morning before the school day begins. At the time of the on-site review, labels and recipes for the items sold were not provided; however, it appears that the foods and beverages sold in the shop are likely not compliant with the Smart Snacks guidelines. 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.

There are specific nutrition standards for foods and beverages sold to students during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption. More information on the Smart Snacks standards can be found on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) web page (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

All foods and beverages sold from Course Grounds must meet the Smart Snacks requirements. Recipes for any items made from scratch will have to be analyzed for compliance. You may use the Smart Snacks Recipe Analyzer tool that is found at the link above. Any packaged items can be analyzed using the [Smart Snacks Calculator](https://foodplanner.healthiergeneration.org/calculator/) (<https://foodplanner.healthiergeneration.org/calculator/>).

Coffee and espresso drinks (including lattes and cappuccinos) are all allowable beverages at the high school level only. Whoever is selling the coffee will have to ensure that the products are offered in acceptable portion sizes to be compliant with Smart Snacks standards. Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; you may either assess this

by determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage.

The calories of the coffee, cream, and sugar needs to be added together when determining if the beverage meets the guidelines below. Here are the beverage guidelines that would apply:

- Calorie-free beverages (for black coffee only):
 - <5 calories per 8 fl. Oz
 - ≤10 calories per 20 fl. Oz
 - Maximum serving size: 20 fl. oz.
- Lower-calorie beverages (for coffee with cream and/or sugar)
 - ≤40 calories per 8 fl. Oz
 - ≤60 calories per 12 fl. Oz
 - Maximum serving size: 12 fl. oz.
 - For espresso and steamed milk beverages (lattes and cappuccinos):
 - May use skim milk, flavored or unflavored
 - May use 1% milk with no added flavoring

Corrective Action Needed: Please submit a detailed written plan that explains how Marshall High School will ensure that all foods and beverages sold at Course Grounds are compliant with the Smart Snacks standards, including who will be responsible for checking compliance. Please include a timeframe for when the foods and beverages sold at Course Grounds will be brought into compliance.

❑ Finding #2: The FFA has a vending machine that is on during the school day. Many of the items in the machine are compliant, but a few were found to be out of compliance. Please note that it is possible to enter products incorrectly in the Smart Snacks Calculator and get a false compliant result. Make sure to look closely at the product's ingredient list and nutrition facts label to ensure that everything is entered correctly.

- Low-fat chocolate milk – only fat-free flavored milk is allowable
- Capri Sun – only 100% fruit or vegetable juice is allowable (the product in the vending machine during the on-site review was not 100% juice)
- Annie's Bunny Grahams – grain products must be whole grain-rich. The first ingredient of this product is "organic wheat flour," which is not whole grain-rich. The first ingredient must be whole grain, such as "whole wheat flour," to be compliant.

These non-compliant products should no longer be sold to students during the school day. After the FFA uses up their inventory of these products, compliant products should be ordered to take their place.

Corrective Action Needed: Submit a written statement explaining how you will ensure that all items sold in this vending machine meet Smart Snacks requirements. Include a timeframe for when the foods and beverages sold in the vending machine will be brought into compliance.

Professional Standards

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The Food Service Director has been pursuing a GOALS certification. This will provide an excellent foundation for your knowledge in USDA School Meal Programs. Keep up the good work!

Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our Professional Standards webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

Directors: 12 hours

Managers: 10 hours

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

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

Staff Working Outside of Food Service with Food Service Duties: job specific training, <4 hours

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

Findings and Corrective Action: Professional Standards

❑ **Finding:** Training is not being monitored on a central tracking tool.

Corrective Action Needed: Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.
- Federal regulations require that food safety inspection reports be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager at work that they are knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.

Sharing Tables

Sharing Tables are permitted in Wisconsin. Considerations and guidance for safe and responsible implementation is outlined below.

Sharing Table

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.

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 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

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.

Monitoring Log

Consider using a monitoring log for items left the sharing 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 webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

Findings and Corrective Action: Food Safety

✓ **Finding:** Most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action Needed: Post most recent food safety inspection report in location visible to public.
Completed on-site. No further action required.

❑ **Finding:** No sanitarian-approved SOP for sharing or no thank you tables.

Corrective Action Needed: Obtain sanitarian approval for applicable SOP. Submit copy of approved SOP with proof of sanitarian approval as an attachment to assigned DPI Nutrition Program Consultant via email. Sanitarian approval is considered email documentation, a completed food safety plan review including the SOP, or a signature from the sanitarian.

Buy American

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- 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? 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.
- The SFA should maintain written procedures to ensure the product received and the inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures <https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management> (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>) are found on the procurement webpage under Buy American.
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

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

Findings and Corrective Action Needed: Buy American

- ❑ **Finding:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form:
- Olives - Spain
 - Pineapple- Indonesia
 - Edamame- China

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

Reporting and Recordkeeping

Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Breakfast Promotion

At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

The breakfast participation is low compared to participation at lunch. The district has a mid-morning breakfast model and recently piloted Breakfast in the Classroom (BIC). Therefore, I recommend the agency focus more on breakfast promotion/marketing throughout the SY aside from pursuing alternate meal service models.

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our Resources for the School Breakfast Program webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted on monthly menus and the website, but efforts should be expanded to promote breakfast via Social Media, parent back-to- school packets, and other communication streams.

- Consider promoting participation with fun menus or promotions.

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 Marshall School District USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the summer meals locator 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 website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the interactive map 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: SBP and SFSP Outreach

☐ **Finding #1:** The agency did not promote summer feeding.

Corrective Action Needed: Submit a plan for how the agency will promote summer feeding near the end of the 1718 SY.

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program

Technical Assistance (TA)

Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk may not be served. **Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk.** Discontinue serving the unallowable flavored milk type. The Smarter Lunchrooms Movement has strategies to encourage the consumption of unflavored milk. (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Findings and Corrective Action: Special Milk Program

✓ **Finding #1:** The paid milk price for SMP indicated within the online contract is incorrect. The online contract indicates \$0.10/milk. However the annual charge is closer to \$0.26/milk.

*Reviewer suggested revisiting the fixed FSMC rate of \$0.43/milk during contract amendment/renewal, as \$0.26/milk for SMP seems high and the only way to lower that household charge is by re-negotiating the FSMC rate. The current household rate could effect participation in the program/unpaid milk charges. In addition, consider that the current milk food cost per carton is ~\$0.20-0.21/carton-and the FSMC does not assist with SMP claim consolidation.

Corrective Action Required: Update the online contract to reflect the actual milk charge of \$0.26 for the 1718 SY. **Corrected. No further action needed.**

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 (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!