

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

School Food Authority: Granton Area School District

Agency Code: 10-2226

School(s) Reviewed: Granton Elementary

Review Date(s): 4/18/17 - 4/20/17

Date of Exit Conference: 4/20/17

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, 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 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, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Granton Area School District for the courtesies extended during the on-site review. Thank you to the Food Service Director, Superintendent, Daycare Manager, Bookkeeper, and Food Service Staff for being available when answering questions and providing additional information when necessary. Administrative and Food Service staff 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. It has been a pleasure working with you all.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

1. The March lunch and breakfast claims were validated and consolidated correctly.
2. All Free and Reduced meal applications were approved correctly and within the required time frame of reception.
3. All denied applications were denied correctly.
4. The correct letter templates regarding Approval/Denial of Benefits, Direct Certification, and Verification were used.
5. Verification was completed by the November 15 deadline. One application was reviewed.
6. The Verification Collection Report was submitted before the February 1 deadline.

Technical Assistance and Program Requirement Reminders

1. Direct Certification is not being run at the required time frames. As a reminder, you are required to run direct certification minimum of three times a year with the *full enrollment* and school codes: at or near the beginning of the school year, three months after the initial run (November) and six months after the initial run (February). Best practice is to run DC once a month.
2. The applications were missing the Determining Official's signature and it was unclear whether the date on the application was the start date or the date received. Be sure to sign and date each application as it is approved.
3. The Confirming Official did not sign or date the application that was chosen for Verification. Be sure to sign and date the application(s) chosen for Verification to document that a Confirmation Review took place.
4. The Verifying Official did not sign or date the application that was chosen for Verification. Be sure to sign and date the application(s) chosen for Verification to document that the application was Verified.
5. One month's worth of income data is required to be submitted by the household selected for Verification in order to complete Verification. Make sure to collect this information when performing Verification.
6. With site-based claiming being implemented in the 17-18 SY, it is important to have the data in the software match what is listed on the online contract. According to Schedule A of the contract, there are two sites at Granton. However, edit checks showed four different sites. To prevent any problems, it is advised to update the software to reflect what is on the contract. The elementary should be K-5 plus the daycare. The high school should be grades 6-12. If the daycare is not going to be claimed under NSLP, then those meals do not need to be combined with the K-5.

Findings and Corrective Action Needed

❑ **Finding #1:** Colored circles are next to each student name indicating their eligibility status within the software system. This is a form of overt identification and is unallowable.

Corrective Action Needed: Remove the colored circles from the screen. Submit an email to the consultant confirming this has been done.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of Granton Area School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. Thank you for submitting thorough crediting documentation, which expedited the menu review for compliance with the meal pattern. The Food Service Director is motivated, innovative, and progressive, working to improve the quality and efficiency of all child nutrition programs offered by Granton Area School District. The kitchen is very clean, pleasantly bright, and welcoming. School nutrition professionals provide exceptional customer service, acknowledging many students by name and keeping the serving area neat and well-stocked. Everyone is open to feedback and suggestions. Great job composting! The majority of students correctly sort their trash, recyclables, and compostable food into appropriate bins. Compost is used in the community garden.

Technical Assistance and Program Requirement Reminders

Whole Grain-Rich

In order to be whole grain-rich, a grain food must list a whole grain as its first ingredient. The first ingredient in Doritos is “corn”, not “whole corn”. Any other grain ingredients in the product must be enriched, if not whole grain. Or, documentation must be available in the form of a product formulation statement (PFS) to show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients. USDA has a very thorough Whole Grain Resource that provides tools and tips for identifying whole grain-rich products: <http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>.

Production Records

Crediting information recorded on the production records was not consistently in agreement with crediting information on the supporting documentation, such as child nutrition labels, product formulation statements, or the Food Buying Guide. Including meal pattern contributions for specified grade groups on production records is not required, though it must be documented and available for staff. Food manufacturers periodically reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. Records should be reviewed and updated at least annually and as new products are purchased or substituted. Please ensure crediting information, whether recorded on production records or separately, is accurate and in agreement with supporting documentation.

Findings and Corrective Action Needed

Finding #1: Doritos are not a whole-grain rich product. Grains that are not whole grain-rich cannot be credited toward the grain component.

Corrective Action Needed: Discontinue serving this product and, if applicable, submit labels for replacement products.

❑ **Finding #2:** Weekly minimum requirements for the meat/meat alternate component are not being met for the K-8 age/grade group as a result of an inaccurate standardized recipe for the turkey sub. A shortage of 0.25 ounces equivalents was identified.

Corrective Action Needed: Please submit an updated standardized recipe for the turkey sub which reflects actual ingredients, portion sizes, and crediting information.

3. RESOURCE MANAGEMENT

Commendations

The 16-17 Paid Lunch Equity Tool was well done. A copy of the 17-18 PLE tool was completed and sent to the SFA while onsite.

Comments/Technical Assistance/Compliance Reminders

1. The Resource Management Risk Assessment Tool was completed with 1 flag. A comprehensive review of non-program foods was required. The SFA has catering, adult meals, extra milk, and second entrees.
2. The Annual Financial Report from the 2014-15 SY and 2015-16 SY need to be revised and updated in order to see the current financial standing of Fund 50.
3. The school has an unpaid meal charge balance policy in place that should be updated to reflect the new regulation. USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, have a written and clearly communicated policy that addresses unpaid meal charges to each household prior to the beginning of the school year. A written policy must be sent to each household.

Check out the Unpaid Meal Charges “In a Nutshell”:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>

Check out the guidance from USDA, see SP 58-2016 Unpaid Meal Charges Guidance:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>

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

Findings and Corrective Action Needed

❑ **Finding #1:** Under the Wisconsin School Day Milk Program, all milk served was being claimed, which is unallowable. Only the milk served to Free and Reduced students can be submitted for reimbursement. In addition to this, the cost of the milk served to Paid students may not be paid for by Fund 50. If the district would like to pay for the cost of the milk served to paid students, a transfer would need to be made to Fund 50 from Fund 10. The other option would be to charge the paid students for the cost of a milk. Conversely, the cost of the milk served to the Free and Reduced students may be paid for by Fund 50. Free and Reduced students must not be charged for a milk.

Corrective Action Needed: Submit a statement in writing (email) stating whether the district will be picking up the cost of the paid students' milk or if you will be charging the paid students for their milk.

4. GENERAL PROGRAM COMPLIANCE

Commendations

1. The Food Safety plan was well done and had all of the required components.
2. The most recent food safety inspection was posted in the cafeteria for the public to see.
3. On-site monitoring form for lunch and breakfast was completed by February 1 and well documented.
4. The Public Release was sent to the Tribune Record Gleaner, Clark County Press, Granton Food Pantry, Clark County Area Food Pantry, and the Clark County Department of Social Services. The district did a fantastic job posting these in media and at grassroots organizations!
5. The 'And Justice For All' poster was properly posted within the cafeteria.
6. All staff members, including teachers, had Civil Rights training at the beginning of the school year. Nice job!
7. The district offers summer meals to the summer school students. Great work!
8. There is a water cooler with cups available to students at lunch in the cafeteria and a water fountain available in the hallway for breakfast.

Comments/Technical Assistance/Compliance Reminders

Smart Snacks

Granton had been holding an annual hamburger fundraiser during the lunch service. This is not allowable since it is being done during the lunch service. If the SFA wanted to hold the hamburger fundraiser in the afternoon, this is acceptable as long as the fundraiser doesn't last longer than two weeks. This is considered a non-compliant food fundraiser.

Someone in the school district should be tracking non-compliant (exempt) fundraisers. Each club/organization within the school is allowed 2 exempt fundraisers for the school year. These cannot exceed 2 weeks of duration and cannot occur during lunch service. For example, if the band wanted to sell candy bars to students in the afternoon, that would be fine as long as the fundraiser doesn't last longer than 2 weeks and doesn't occur during lunch service. That would be considered one exempt fundraiser for band. They would be allowed one more for the year. List of non-food fundraising ideas: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/healthy-fundraising-ideas-flyer.pdf>

At this time, there are no foods outside of the reimbursable meal, besides extra milk and extra entrees, being sold to students for consumption during the school day. If this changes, make sure to review any foods or beverages sold to students during the school day for compliance with Smart Snacks regulations. Refer to the Smart Snacks "In a Nutshell" handout at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf> for more

information. Additional information can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Special Dietary Needs

There is a ‘peanut free’ labeled table instead of a ‘peanut aware’ labeled table. ‘Peanut aware’ or ‘Allergen aware’ is preferred over labeling the table as ‘peanut free’ or ‘allergen free’ because food service cannot guarantee the table is always allergy or peanut free. This was updated onsite.

Professional Standards

Consider using the [DPI tracking tool](#) to track Professional Standards training hours for staff.

- 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, volunteer, etc.), professional standards position (director, manager or staff) name of training, and where the training was taken from (i.e. USDA webinar, DPI SNSDC course, etc.). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Buy American

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf. Some non-domestic items found onsite were: pineapple from Thailand/Philippines, mandarin oranges from China, maraschino cherries from Canada, and olives from Spain. Work with your vendor to receive domestic items as much as possible. Track the non-domestic items using this tracking tool:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>

Findings and Corrective Action Needed

Finding #1: The full, updated USDA Non-discrimination statement must be added to the carryover letters sent to households because it involves the school meal program benefits.

Corrective Action Needed: Update the carryover letter to include the updated full length USDA Non-discrimination statement and email a copy of it to the consultant.

5. OTHER FEDERAL PROGRAMS REVIEWS

Comments/Technical Assistance/Compliance Reminders

1. For the Afterschool Snack Program, two components were packaged together so that students received a reimbursable snack. Since the elementary school is area eligible, consider using

this check off sheet to keep track of snacks claimed for reimbursement:

https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/assnacks_menu_prod_ct.doc

2. Since the elementary school qualifies for the Area Eligible Afterschool Snack Program (AE-ASP), the high school may also participate in AE-ASP if there are afterschool enrichment programs available for students to participate in. The elementary school is considered a feeder school and qualifies the high school based on its area eligibility. If the SFA is interested in adding AE-ASP at the high school, the online contract must be updated.
3. The Daycare is being run by the school district. They follow the CACFP meal pattern but claim under NSLP and SBP. It is advised that the SFA find a way to enter the Daycare students into the software system, but not have them enrolled. This way their meals can be tracked via the software system rather than a check off sheet.
4. The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

The Wellness Policy should be updated to include:

- a. Specific measurable goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
- b. Nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
- c. At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process.
- d. Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies on school website, social media, newspaper, or newsletters.
- e. Document public involvement, public updates, policy leadership, and evaluation plan.
- f. SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy.
- g. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis. Some methods of notification include mailing flyers, newsletters, emails, website postings, and newspaper articles.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Findings and Corrective Action Needed

❑ Finding #1: The on-site monitoring forms for the Afterschool Snack Program were not completed.

Corrective Action Needed: The Food Service Director needs to observe Afterschool Snack service and complete the on-site monitoring form. Submit the form to the consultant.

❑ Finding #2: All milk (free, reduced, and paid) served for the Wisconsin School Day Milk Program was being claimed annually. Under the WSDMP, only the free and reduced milk served is allowed to be claimed for reimbursement.

Corrective Action Needed: Discontinue claiming paid milk. Submit the 16-17 WSDMP edit check report.

❑ Finding #1: Fund 50 is not being reimbursed for paid or reduced student meals from the daycare. It is up to the district if they want to continue this as a non-pricing option, but claiming each student in their respective eligibility category, as it is an allowable expense of the Fund 50 account. If you would like Fund 50 to be reimbursed for the cost of these meals, then the price of the meals should be included in the daycare fee and paid to Fund 50.

Corrective Action Needed: Submit a statement in writing (email) stating how you plan to handle the daycare meals.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

