

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

School Food Authority: Neillsville School District

Agency Code: 10-3899

School(s) Reviewed: Neillsville Elementary School

Review Date(s): 3/20/17 - 3/22/17

Date of Exit Conference: 3/22/17

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 Neillsville School District for the courtesies extended during the on-site review. Thank you to the Food Service Director, Business Manager, Superintendent, 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 this week.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

1. The February breakfast claim was validated and consolidated correctly.
2. The February Special Milk Program claim was consolidated correctly.
3. Direct Certification (DC) has been run the required amount of times for the school year. The Food Service Director does a great job running Direct Certification multiple times throughout the school year.
4. The correct letter templates regarding Verification were used.
5. Verification was done completely and well documented. Three applications were verified.
6. The Verification Collection Report was submitted before the February 1 deadline.

Technical Assistance and Program Requirement Reminders

1. Be sure to record the correct eligibility start date into Infinite Campus, which is the date DC is run.
2. Remember to run the Edit Check report for all schools when completing the lunch and breakfast claims.
3. Verification can begin October 1. Be sure to start the process earlier next year to ensure it is finished by the November 15 deadline.
4. Verification Collection Report – record the number of applications on file as of October 1.
5. Get a full month's worth of income documentation from households picked for Verification.
6. To ensure overt identification is not occurring, have all non-nutrition staff that have access to Free/Reduced applications or student eligibility records to sign the disclosure agreement:
<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>

Findings and Corrective Action Needed

- Finding #1:** The incorrect report was being used to consolidate the monthly claims for reimbursement.
 - **Corrective Action Needed:** Begin using the Edit Check report through Infinite Campus for each site that participates in NSLP and SBP. Scan and email copies of the March Edit Check reports for lunch only.
- Finding #2:** Three households are receiving free benefits that should have originally determined as reduced price eligible. There was a calculation error on the application.
 - **Corrective Action Needed:** Notify the households, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the student's eligibility in the system, 10 calendar

days from the date the notification letter was sent out. A letter was sent out on 3/21/17. No further action required.

❑ **Finding #3:** Two students of a household are receiving free benefits from an extension of benefits error. One of the household members was directly certified as foster, but this is an unallowable extension of benefits.

- **Corrective Action Needed:** Notify the household, whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. A letter was sent out on 3/21/17. No further action required.

❑ **Finding #4:** Two households are receiving reduced benefits that should have originally been determined as free eligible. There were a calculation errors on the applications.

- **Corrective Action Needed:** Notify the households, whose benefits will be increased from reduced to free, immediately. Letters were sent out on 3/21/17. No further action required.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Thank you to the Food Service Director for her complete submission of all needed materials. It is evident she has a firm grasp on the National School Lunch Program meal program and offers a menu with a variety of foods and flavors. She is proactive in reducing the sodium in her school meals and states she has seen positive effects from her district's children when eating the nutritious meals that this program provides. She is a great asset to Neillsville School District.

Technical Assistance and Program Requirement Reminders

The Food Service Director and Public Health Nutritionist, Molly Gregory, discussed the alternate entrée meal of sandwiches that are offered daily. They are planned to provide 2 ounce equivalents of meat/meat alternate with the lunchmeat and cheese. Students are given the opportunity to decline the cheese slice before the sandwich is wrapped. It was confirmed that this is acceptable within the meal pattern and does not result in a weekly shortage of meat/meat alternate, as the entrée was planned to meet both daily and weekly requirements when offered on a daily basis. Without the cheese slice, the sandwich still provides over 1.0 oz equivalent and fulfills the daily requirement.

As stated previously, the Food Service Director is well-versed in school meal regulations and no findings related to Section 3 of the Administrative Review were found. As with all School Food Authorities, we recommend continued training by participating in this summer's School Nutrition Skills Development Courses (SNSDC). We offer a variety of updated and new 2-, 4, or 8-hour courses which will help satisfy Professional Standards requirements and provide a great networking opportunity for staff. Dates, locations, course descriptions, and registration posted on our training webpage: <https://dpi.wi.gov/school-nutrition/training#up>

Under the Offer Versus Serve (OVS) policy for the breakfast meal pattern, four items must be offered from the three components (grain [and/or meat/meat alternate], fruit/vegetable, and milk). An item is defined as 8 fluid ounces of milk, ½ cup of fruit/vegetable, and 1.0 ounce equivalent (oz eq) of grain and/or meat/meat alternate. If only 1.0 oz eq of grain is planned for the day, please make sure that at least three other items are planned with the meal. For additional OVS guidance, please see: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>

It is required to post signage visible to the students that indicate the offered components in each meal and what they must select in order for their meal to count as reimbursable. The breakfast signage should list the three components and the four items offered, and must communicate to students that under Offer Versus Serve, a student must select at least three food items, one of which must be at least ½ cup of fruit, vegetable, or a combination of fruit and vegetable.

Finding: Kitchen staff members at the point of service during breakfast were somewhat unclear about the Offer Versus Serve (OVS) requirements for breakfast. It is important for staff to fully understand the OVS requirements. The most up-to-date *Offer Versus Serve Guidance* manual is available on our website: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>.

Corrective Action: We offer a two hours OVS in-person training through the School Nutrition Skills Development Courses. It is highly encouraged that any new food service staff responsible for determining reimbursable meals attend this interactive and fun course. The dates and locations for our summer training are posted on our training webpage: <https://dpi.wi.gov/school-nutrition/training#up> Please register and attend a location that is convenient for you. The Food Service Director is planning to have employees attend SNSDC. No further action required.

3. RESOURCE MANAGEMENT

Commendations

The 16-17 Paid Lunch Equity Tool was well done. USDA has released the 17-18 PLE tool and it is available for use on the SNT website.

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 district 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, to have a written and clearly communicated policy that addresses unpaid meal charges to each household prior to the beginning of the school year.

Any alternate meals for students with a negative balance cannot be charged to Fund 50.

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 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

4. GENERAL PROGRAM COMPLIANCE

Commendations

1. The Food Safety plan was well done and had all of the required components.
2. The first Food Safety Inspection was completed in December for the reviewed site and the second inspection is scheduled for later this spring.
3. On-site monitoring forms for lunch were completed by February 1 and well documented.
4. Food Service Director does a great job making sure each staff member receives proper OVS training, as well as Civil Rights, Food Safety, and other required trainings at the beginning of the school year to meet Professional Standards requirements.
5. Professional Standards are being well documented for all staff members.
6. For Buy American, the Food Service Director is tracking all non-compliant items. There was pineapple from Thailand, winter vegetable blend from Mexico, and mandarin oranges from China. Use the form on the Procurement website to document all non-compliant items: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>

Comments/Technical Assistance/Compliance Reminders

1. The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo SP 56-2016 <http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.
2. The public release needs to be posted at a minimum of three grassroots locations. Per our discussion, post the public release at the social services office and the food pantry in addition to publishing it in the local newspaper.

Findings and Corrective Action Needed

Finding #1: The USDA non-discrimination statement should be in the same size font as printed on the approval/denial of benefit notification letters.

Corrective Action Needed: Update the letter template used on Infinite Campus to have the current, full and correctly formatted non-discrimination statement. Scan and email a copy of this new letter.

5. OTHER FEDERAL PROGRAMS REVIEWS

Comments/Technical Assistance/Compliance Reminders

1. 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>.

Comments/Technical Assistance/Compliance Reminders

1. Be sure to use the Edit Check report from Infinite Campus for the Wisconsin School Day Milk claim to ensure accurate milk counts.

2. Neillsville Elementary School participated in Breakfast in the Classroom (BIC) prior to the 16-17 SY, discontinuing it due to complaints by teachers. This caused a large decrease in participation of the School Breakfast Program. There was a discussion between the Consultant, Food Service Director and Elementary Principal regarding reinstating BIC.

While reviewing breakfast service, there was a bottleneck at the point of service. To make the flow of service easier on students and staff, the computer could be put at the beginning of the line, having the students plug their pin numbers in first. Then the students would go through the breakfast line and take their 3 breakfast items (1 being a half cup fruit or fruit juice). A second food service employee would need to be at the end of the line making sure each student has their reimbursable breakfast before they sit down to eat.

Another option would be to add a second point of service computer at the end of the breakfast line, with another food service employee operating that computer and checking reimbursable breakfasts. The key points here are to make sure each student is taking a reimbursable breakfast and that they are being entered into the computer system.

Findings and Corrective Action Needed

Finding #1: The DPI Non-program Food Price Calculator tool was not completed prior to the on-site review.

- **Corrective Action Needed:** Complete the DPI Non-program Food Price Calculator tool and submit it via email for review.

Finding #2: The on-site monitoring form for breakfast at the elementary school was not completed by February 1.

- **Corrective Action Needed:** Complete this form and email a copy to the consultant.

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.



Every Child a Graduate
College and Career Ready

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