

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

School Food Authority: Pardeeville SD

Agency Code: 11-4228

School(s) Reviewed: Pardeeville Elementary School

Review Date(s): 4/3-4/18

Date of Exit Conference: 4/4/18

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture 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.US Department of Agriculture.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.US Department of Agriculture.gov/healthierschoolday).

Appreciation/Commendations/Noteworthy Initiatives

Thank you to the staff at Pardeeville School District for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- Of the 264 students eligible for free/reduced price meals in February, a sample of 158 was pulled and 2 students had benefits issued incorrectly

Direct Certification

- All original direct certification files, before they have been uploaded into the software system, must be saved at the district as part of records retention

Free and Reduced Price Meal Applications

- Households who are denied benefits must receive written notification of the denial. The notification must advise the household of:
 - Reason for denial of benefits;
 - Right to appeal;
 - Instructions on how to appeal; and
 - Ability to reapply for free and reduced price benefits at any time during the school year.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** From the student sample reviewed for benefit's issuance, 1 student is receiving reduced benefits and 1 student is receiving free benefits and both households should be full pay.
Corrective Action Needed: Please notify these households of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be figured for these errors for the review period (February) and month of on-site review (March). Completed on site, no further action required.
- ❑ **Finding #2:** The original Direct Certification txt. Files were not retained by the district.
Corrective Action Needed: Please provide a statement of understanding that going forward, all original txt. DC files will be retained by the district for 3 years plus the current year. Completed on site, no further action required.
- ❑ **Finding #3:** Households who are denied benefits are sometimes notified by phone which is not allowed, as all denied applicants must be notified in writing with appeal rights.
Corrective Action Needed: Please provide a statement of understanding that all denied applicants will be notified in writing of the denial with appeal rights.
- ❑ **Finding #4:** Contract does not have "Alternate Agreement" checked on Schedule A for St. John Lutheran School.
Corrective Action Needed: Please update your online contract with this information and notify Gina Kulka when this is complete, so she may go in and approve the change.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of Pardeeville School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. The kitchen at Pardeeville Elementary was clean and cheerful. School nutrition professionals provided exemplary customer service, warmly greeting students and kindly encouraging them to select full components and to try unfamiliar foods. Between arrivals of classes during lunch meal service, school nutrition professionals busily cleaned the meal service line, cafeteria tables, trays, and pots and pans. The Food Service Director was highly responsive to technical assistance and requests for additional information.

Technical Assistance and Program Requirement Reminders

Crediting Documentation

- Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting. Provide crediting information for these products by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the products. Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components. If proper documentation cannot be obtained, you should discontinue using these products for school meals. More information about crediting documentation can be found on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

Food Buying Guide

- The [USDA Food Buying Guide for School Meal Programs](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods), including fruits and vegetables. Foods that do not have standards of identity are not listed in the Food Buying Guide and require further documentation (a CN label or a PFS) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs. Refer to the Food Buying Guide for more details on how specific foods and ingredients credit toward the meal pattern (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>). The [Food Buying Guide Mobile App](#) provides quick access to food yield information to help you make quick purchasing decisions from your mobile device (<https://www.fns.usda.gov/tn/food-buying-guide-mobile-app>). According to the Food Buying Guide, 1.1 ounces of apple slices credit as 1/4 cup of fruit; therefore, 2.4 ounces of apple slices credit as 1/2 cup of fruit.

In-House Yield

- In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the school food authority's next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG (e.g. tri taters). [Specific and verifiable procedures](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-specific-and-verifiable-procedures) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-specific-and-verifiable-procedures>)

house-yield-study-procedures.pdf), which must be followed, are available on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy).

Standardized Recipes

- Standardized recipes are required for all menu items that have more than one ingredient (e.g. meatball sub [meatballs in marinara sauce]). 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. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning webpage](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

Production Records

- Planned portion sizes are required for every meal component and condiments. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take.
- Be specific on production records about the identity, brand, and description of the items served. List the specific type of graham crackers or whole grain crackers offered, as these descriptions do not identify exactly what was served. There is a wide variation in formulation of the many products that fall into these categories.
- A variety of milk, at least two allowable milk types, is required to be offered daily at lunch and breakfast. Allowable milk types in Child Nutrition Programs include nonfat (skim) unflavored milk, nonfat (skim) flavored milk (e.g. chocolate), and low-fat (1%) unflavored milk. Milk types available and actual usage by type (or milk recipe) must be recorded on production records.
- A list of production record requirements (“Must Haves and Nice to Haves”) and sample production record templates can be found on the [Production Records webpage](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). A copy was also left onsite.

Weight versus Volume

- Use cup volume amounts when recording portion sizes on the production records for fruits and vegetables. Fruit sizes (e.g. case count) should also be recorded. This is the easiest way to ensure the meal pattern requirements are met. Weight and volume may not be used interchangeably for crediting purposes. A [portion control webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#pc) (https://dpi.wi.gov/school-nutrition/training/webcasts#pc), which describes portion control techniques and explains the difference between weight and volume, is available. Earn fifteen minutes of continuing education credit by viewing the webcast.

Substitutions

- Any changes to the planned menu must be documented on the production record. A substitution should be a food that credits comparably to the original planned item, have a similar nutrition profile, and belong to the same vegetable subgroup (when applicable) to the extent practicable. However, it is always better to substitute something creditable, rather than have a missing component.

Running Out of Food

- With a satellite kitchen, school nutrition professionals must assess the quantity of components halfway through meal service to ensure each student is offered the proper amount of each component. Immediate corrective action should be taken to address component shortages by either calling the production kitchen for more of the required component or by having a small stock in-house in case of emergencies. If timing does not allow for delivery of additional food, offering the remaining food but not claiming reimbursement for the meals is an option.
- Development and implementation of a tracking tool may improve the accuracy of planned meals compared to meals served. Ordering too much and discarding leftovers is a food cost issue. Food shortages do not improve or maintain participation rates, and the school potentially loses out on reimbursement.

Recipes Breakfast Items

- If it becomes too time- or labor-intensive to record breakfast item (e.g. cereal, juice, muffin, etc.) usage by type on production records, consider using recipes. Individual recipes document average breakfast item usage by meal and grade group. When a breakfast item recipe is on file, total usage must still be recorded on production records. Recipes must be updated twice per year or when students' preferences change.

Grain-Based Desserts

- No more than 2.0 oz eq of grain-based desserts may be offered per week at lunch. Grain-based desserts that are whole grain-rich credit towards the grain component, but grain-based desserts that are not whole grain-rich (made with more than 50 percent *enriched* grains) do not credit towards the grain component. Grain-based desserts contribute towards the weekly grain-based dessert limit regardless of whether or not they are whole grain-rich.

Offer Versus Serve (OVS)

- There is some confusion over the difference between OVS and the planned menu. The planned menu must be in compliance with all meal pattern requirements, both daily and weekly. OVS occurs only during meal service. Therefore, the printed menu, recipes, portion sizes on production records, etc., should reflect the menu and portion sizes as planned.
- Under OVS, students must *select* at least 1/2 cup of fruit, vegetable, or a combination as one of their three components. However, in order to meet daily minimum requirements, they must be *offered* at least 3/4 cup of vegetable and 1/2 cup of fruit (following the K-5, 6-8, or K-8 USDA lunch meal pattern).
- Three food components are required for adequate, nutritious meals for students and to warrant federal reimbursements. Within each component, different food items may be offered, giving students many combinations for building a reimbursable meal. Other than selecting the required minimum 1/2 cup fruit, vegetable, or combination serving, it is the student's choice to select or decline a food component. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) is available on the SNT website (dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf).
- If only three components are selected, and two of these are fruit and vegetable, the student may only select the 1/2 cup portion for the fruit OR vegetable. For the other two components, the student must select at least the daily minimum required serving of the components for them to be counted.

Child and Adult Care Food Program

- The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children

aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

- Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is thought of as a dessert or treat. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).
- Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk may not be served. Children one year old should be served unflavored whole milk. **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 chocolate fat-free milk at lunch. The Smarter Lunchrooms Movement has strategies to [encourage the consumption of unflavored milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).
- Offer Versus Serve (OVS) is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service. For more information please visit the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding #1:** The daily minimum requirement for vegetables was not met on February 5 or 6 during the review period. One-half cup of vegetables was planned, offered, and served each day; the daily minimum requirement of 3/4 cup was not met. Per the Food Service Director, marinara sauce offered with the meatball sub on Monday, February 5, was not credited towards daily or weekly meal pattern requirements. Peas were the only vegetable offered on Tuesday, February 6. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**
Corrective Action Needed: Please submit a statement describing how you will meet the daily minimum requirement going forward.
- ❑ **Finding #2:** The daily minimum requirement for m/ma was not met on February 8 as result of insufficient portion size information required to credit BBQ towards daily meal pattern requirements. 0.5 oz eq of cheese was planned, offered, and served; the daily minimum requirement of 1.0 oz eq was not met. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**
Corrective Action Needed: Submit portion size weights for a 2 ounce scoop of BBQ. Portion size weight will be evaluated against the standardized recipe and against daily meal pattern requirements.
- ❑ **Finding #3:** Milk is a required component as part of the National School Lunch Program and School Breakfast Program. You must record daily milk varieties and milk usage by type on production records. Milk varieties and milk usage by type was not documented on either the breakfast or the

lunch production records submitted for the review period.

Corrective Action Needed: Please refer to the Required Corrective Action under Meal Pattern Finding #4.

- ❑ **Finding #4:** Current production records do not include all required information.
Corrective Action Needed: Update production records to include the following missing information: serving site (no designated space); planned number of portions; milk types available and actual usage by type; and planned portion size and actual usage for condiments and any extra menu items. **Please submit three full days of completed production records for Pardeeville Elementary, updated to reflect these requirements.**
- ❑ **Finding #5:** Two vegetables were offered during meal observation on April 3 – 1/2 cup of mashed potatoes and 1/4 cup of green pepper strips. When the fourth grade classes arrived to the cafeteria for meal service, there were not enough green peppers available to offer students the planned 1/4 cup portion. Per the school nutrition professionals, no additional vegetables were available onsite to replace the green pepper strips. Therefore, the portion size of mashed potatoes was increased from 1/2 cup to 3/4 cup.
Corrective Action Needed: Please submit a statement describing how running out of food will be corrected and avoided in the future.
- ❑ **Finding #6:** School nutrition professionals will benefit from additional OVS training.
Corrective Action Needed: Watch the [Offer Versus Serve webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) on the DPI School Nutrition Team webpage or comparable training with approval from the Public Health Nutritionist. Please submit a roster or checklist indicating all meal service line staff have viewed the webcast.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues, including reimbursements and student payments, and expenses, including food, labor, equipment, purchased services, and other need to be allocated to the program to which they belong. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf). The [purchase record template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/purchase-record-revenue-template-monthly.xlsx) on the DPI website may aid in this expense and revenue separation (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/purchase-record-revenue-template-monthly.xlsx).

Allowable 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found on our Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).
- Money from food service (Fund 50) cannot be used to support local initiatives to donate or give away food. It is critical for a school participating in the federal school nutrition programs to be able to show that federal and state reimbursement received for reimbursable meals is used specifically to support

the cost of providing reimbursable meals.

Unpaid Meal Charge Policy

- 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. 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) (<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

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, all of the expenses were not separated out by individual programs. Most of the expenses were put into NSLP and no revenues or expenses were allocated to nonprogram foods.
Corrective Action Needed: Please provide a statement of understanding that you will develop a process to report your 17-18 Annual Financial Report with revenues and expenses accurately broken out by program and category.
- ❑ **Finding #2:** The district has no written unpaid meal charge policy, which was required to be in place and distributed to families by July 1, 2017.
Corrective Action Needed: Please develop a timeline for a written unpaid meal charge policy and its distribution to households.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- 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 nonprogram food costs 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.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) 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>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** The Nonprogram Foods Revenue Tool has not been completed for the current school year.

Corrective Action Needed: Please watch the [Nonprogram Foods Revenue Tool webinar](#) and complete the Nonprogram Food Revenue Tool for the current school year using a minimum of 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/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as the other text in the document.

Processes for complaints

- All SFAs must have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complain Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- **All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days.** You will want to make sure that this is included in the district procedures to ensure compliance.

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** The shortened statement is not on the menu and no Nondiscrimination Statement is posted on the website.

Corrective Action Required: Please submit the May with the correct shortened statement, “This institution is an equal opportunity provider”, and post the current long statement on the the food service page of your website.

On-site Monitoring

Commendations/Comments/Technical Assistance/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 by February 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) (<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>).
- 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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: On-site Monitoring

- ❑ **Finding #1:** The SFA did not complete On-site monitoring by February 1.
Corrective Action Required: Please provide a statement of understanding that all On-site Monitorings will be completed, yearly, by February 1.
- ❑ **Finding #2:** The SFA did not use the current On-site monitoring form to complete its monitoring of the NSLP and separate School Breakfast monitoring form which is required to be completed for 50% of the breakfast sites.
Corrective Action Required: Please complete the current on-site monitoring forms [Administrative Review](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review) for all NSLP sites in the SFA and 50% of the breakfast sites in the district. As breakfast procedures may be different than lunch procedures separate monitorings are required. <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-onsite-monitoring.doc> and <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc>.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

- The district's Wellness Policy contains all of the required elements. Just as a reminder, SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP.
- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

- At the time of the on-site review there were no competitive foods or beverages sold at Pardeeville Elementary. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- The Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) may be used to assess product compliance (<https://foodplanner.healthiergeneration.org/calculator/>). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records. As a best practice, staple a complete label with nutrition facts (name of the food item, brand name, nutrition facts, and ingredients) or empty package to the printout.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

- SFAs must 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). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- 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.).
- **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

Findings and Corrective Action: Professional Standards

- Finding #1:** Training is not being monitored on a 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 and Storage

Commendations/Comments/Technical Assistance/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Inspections

- The most recent food safety inspection must be posted in a publically visible location.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Most recent Food safety inspection was not posted in public view at the Pardeeville Elementary School cafeteria.
Corrective Action Needed: Please move out into cafeteria and take a picture of placement and submit as corrective action.
- ❑ **Finding #2:** Since some TCS foods are held outside of mechanical refrigeration or heat during service at Pardeeville Elementary School, the use of Time as a Public Health Control must be used. Standard operating procedure (SOPs) for Time as a Public Health Control is not included in the food safety plan.
Corrective Action Needed: Add and adapt a site-specific Time as a Public Health Control, SOP to the food safety plan and submit an updated SOP as attachment via email.

Buy American

Comments/Technical Assistance/Compliance Reminders

- 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.
- There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:
 1. Date
 2. Name of product
 3. **Country of origin (be specific)**
 4. **Reason (must select one)**
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product
 - e. Distribution- record the reason the distributor carries the non-domestic product
 - f. Other- explain
 5. You may record additional information if you find it beneficial.
- **Label does not identify country of origin:**
 In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the TA notes above for sample certification language. This will be treated as TA for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

Findings and Corrective Action Needed: Buy American

- ❑ Finding #1:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Non-compliant List:
- Garlic powder from China
 - Cucumbers from Mexico
- Required Corrective Action:** Provide a copy of the updated Non-compliant List, including the two non-domestic products identified above.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

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 Pardeeville, USDA would like 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](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. 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>).

Findings and Corrective Action: SFSP Outreach

- ❑ **Finding #1:** No summer food service outreach was provided to students.
Corrective Action Needed: Please provide a statement that Pardeeville SD will do summer food service outreach for the 17-18 school year.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

- Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one.
- Per the Agreement in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid.

Findings and Corrective Action: Wisconsin School Day Milk Program

- ❑ **Finding #1:** The Wisconsin School Day Milk claim was filed with free student’s milk numbers recorded in milk claimed and reduced student’s milk numbers were recorded under juice claimed, which was found to be a simple clerical error.
Corrective Action Needed: Please provide a statement of understanding that all milks served to free and reduced students will be reported as free and reduced milks served.
- ❑ **Finding #2:** The half pint milk cost that is used for the WSDMP claim is the highest half pint cost and must be a weighted average half pint milk cost, as white milk is less expensive than chocolate milk.
Corrective Action Needed: Please provide a statement, that going forward, a weighted average milk cost will be used for all WSDMP claims.
- ❑ **Finding #3:** For the Wisconsin School Day Milk Program (WSDMP), the students are charged for their milk before they receive their milk. This constitutes an inaccurate Point of Service (POS).
Corrective Action Needed: Please correct and train all who administer the WSDMP on the Point of Service process. Please submit 2 weeks of correct weekly WSDMP milk counts and the sign-in sheet from the conducted training to DPI as corrective action.

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 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).



With School Nutrition Programs!