

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

School Food Authority: Deerfield Community
School District

Agency Code: 131309

Review Date(s): 5/8/18–5/9/18

School(s) Reviewed: Deerfield High School

Date of Exit Conference: 5/9/18

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

Appreciation/Commendations/Noteworthy Initiatives:

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

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Of the 123 eligibility determinations reviewed, there were no errors to note. Great job!

Technical Assistance:

Effective Eligibility Dates:

- It was noted that some effective eligibility dates did not match the dates of the application approval or of the direct certification output file.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the determining official.
- The effective eligibility date for a direct certification eligible student is the date of the original output file.

Income Frequency

- The determining official annualizes all incomes reported on applications, regardless of reported income frequencies. Only when an application has multiple income frequencies listed, should the income be annualized before a determination is made.
- On the other hand, when an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual or monthly, but instead use the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) to look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

Limited English Proficiency (LEP)

- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The non-profit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Disclosure

- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year.
- Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>). Please note that parental consent is needed for

information to be shared for each individual fee waiver offered—not simply for one lump sum of a combination of fees.

- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Transferring Students

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

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding A:** Household notification letters for direct certification approvals, application approvals, verification (“We MUST Check” and “We HAVE Checked”), and application denials do not meet requirements. The denial letter does not state that households may reapply for benefits any time throughout the year. The direct certification letter does not contain information about Medicaid or FDIPIR. All letters currently contain the incorrect non-discrimination statement.

Corrective Action Needed for Finding A: Because the SFA is changing their electronic student management system over the summer, providing updated copies of the letter as corrective action is not necessary at this time. The new electronic system will allow for new letter templates to be created and utilized. As corrective action, please provide a written description to the consultant detailing how the letters will be updated for the upcoming 2018-19 school year within the new electronic system so that all letters meet the requirements.

Verification

Commendations:

- Verification was completed correctly and on time. The designated officials paid particular attention to detail when reviewing the submitted paystubs, including noting a discrepancy in reported income frequency.

Technical Assistance:

Duties of Officials

- While the designated officials correctly completed the confirmation review and the rest of the verification process, technical assistance was provided on the duties of each official. Most applications were unnecessarily signed by the confirming official as a “double check” even though

the application was not selected for verification. As a reminder, the confirming official only needs to review and sign applications selected for verification in order to confirm the initial eligibility determination by the determining official. After this confirmation review, the verifying official may proceed with the verification process.

Findings and Corrective Action Needed: Verification

- ❑ **Finding B:** The adverse action letter sent to the household selected for verification indicated that their benefit would not change from free to reduced until 10 calendar days later. However, the benefit issuance list indicated that the benefit was decreased on the same day that the letter was generated and sent. The household was not given the required 10 calendar days before benefit reduction.

Corrective Action Needed for Finding B: Provide a statement to the consultant detailing how adverse action will be managed going forward so that households are given the required 10 calendar days before benefits are decreased.

Meal Counting and Claiming

Technical Assistance:

Field Trip Meals

- It is great that field trip meals are offered to students so that they have access to an affordable, nutritious meal while on a trip. However, the current point of sale procedures are not currently being met. See corrective action below.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding C:** The current POS system for field trip meals does not meet POS requirements. Currently, student accounts are charged for field trip meals based on who ordered meals and had a meal prepared for them. This system allows for the possibility that a student could be charged for a meal they did not take and eat.

Corrective Action Needed for Finding C: Please modify the field trip POS system so that students are checked off by the accompanying teacher as they take their meal. Completed check off sheets should be returned to food service and used for charging student accounts and claim submission. The [field trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) can be of assistance in the modification of field trip POS (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). Please submit a written plan to the consultant detailing how field trip meals will be counted and claimed going forward, including a copy of the check off sheet that will be used at the POS.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Thank you to the food service director, food service manager, and school nutrition professionals at Deerfield Community School District. The time and efforts spent preparing for and participating in the on-site reviews is much appreciated. Being new to the position, the food service manager is doing a great job serving healthy meals to students and shows great enthusiasm for learning about child nutrition programs!
- It is great that students are offered multiple entree options daily at lunch, along with an appealing garden bar. The practice of only offering a la carte snacks at lunch after the reimbursable meal has been served is a great way to maintain participation rates. Additionally, hearing that the food service manager is part of such an active Health & Wellness Committee is commendable. Thank you for all the hard work put in for the students of Deerfield Community School District!

Technical Assistance:

Weight vs. Volume

- Meat/meat alternate (M/MA) is credited by weight, not by fluid ounces. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving of ground/diced/shredded meat. Fluid ounces are a volume measure, while ounces are a weight measure. To ensure that students are receiving the adequate amount of meat/meat alternate, weigh the meat/meat alternate, then determine which scoop will hold that weight of meat. For more practice with weight versus volume, watch the, [What's the Scoop with Portion Control](https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story_html5.html) webcast (https://media.dpi.wi.gov/school-nutrition/whats-the-scoop-on-portion-control/story_html5.html).

	Measures	Measured In	Tools Used
WEIGHT	Meat/meat alternates Grains	Ounces (oz) Grams (g) Kilograms (kg) Pounds (lb or #)	Scale
VOLUME	Fruits Vegetables Milk	Fluid ounces (fl oz) Tablespoon (T or TBSP) Teaspoon (t or tsp) Cups (c) Pint (pt) Quart (qt) Gallon (gal) Liter (L)	Spoodles , measuring cups, measuring spoons, scoops, dishers, ladles

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

Sodium

- The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined sodium limits using three targets, allowing for a gradual implementation. The first target was implemented on July 1, 2014 and remains in effect for the 2017-2018 school year. Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, olives, pickles, and processed food items. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years.
- Promotion of correct condiment serving sizes can be done by adding signage at the condiment station with a photo of what one tablespoon of dressing looks like or using signage such as “One squeeze, please!” on self-serve squirt bottles. More information on sodium targets is found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-menu-planning) webpage, under the Sodium heading (dpi.wi.gov/school-nutrition/national-school-

lunch-program/menu-planning). The optional “Weekly Nutrient Calculator” tool to help monitor compliance with sodium targets is also found on the [Menu Planning](#) webpage, under the Menu Planning Tools heading.

Minimum and Maximum Ounce Equivalents

- While the weekly grain and meat/meat alternate maximum ounce equivalents (oz. eq.) are only recommended targets, it can be difficult to meet the dietary specifications if the menu is exceeding these targets. For example, the chili offered on the 3rd Line during the week of review credits as 3.25 oz. eq. of meat/meat alternate and is offered along with additional meat/meat alternate sides, such as cheese or hard-boiled eggs. While students are limited to two of the meat/meat alternate sides in addition to the chili, this amount is still well above the 2 oz. eq. meat/meat alternate daily requirement for students in grades 9-12 and the weekly meat/meat alternate requirements. Consider reducing the amount of beef used in the chili recipe, offering only 1 oz. eq. meat/meat alternate sides, and/or limiting students to one additional meat/meat alternate choice.

Meal Pattern and Grade Groups

- The production records submitted for the week of review indicated that the students in grades 7-8 were being offered many of the menu items in the same planned serving size as the students in grades 9-12. The meal pattern and dietary specifications differ between these two grade groups, so one planned portion size for these students may not always be appropriate based on their respective meal patterns. Additionally, if students in grades 7-8 are consistently being offered larger portion sizes than what is required for their meal pattern, there is a greater risk of exceeding the dietary specifications for this grade group. Although the middle school was not included in this administrative review, it may be addressed on future administrative reviews.

Standardized Recipes

- Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use in the specific food service 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. Standardized recipes should be updated any time a product, process, or quantity is changed. 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>).
- Instead of listing the sub bun and the meat separately on the production record, a standardized recipe should be created and the sub sandwich recipe itself may be included on the production record. This may be done for any menu item with more than one ingredient that is served to students pre-assembled.

Field Trip Meals

- Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way for collecting meal payments, and obtaining a count by eligibility category.
- If the school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, the grain, meat/meat alternate, and vegetable may be offered together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. 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>).

School Breakfast Program

- Consider participating in the School Breakfast Program (SBP). By participating in the SBP, the SFA can help students start their school day with good nutrition and be provided reimbursement for doing so. Currently, only high school students are offered an a la carte snack during a mid-morning break. Many students took advantage of this during onsite observation. Some of the popular items offered as a la carte snacks could be served as part of a reimbursable breakfast.
- Please note that the only requirement for timing of breakfast service is that it may not overlap with lunch. Lunch must be served between 10am and 2pm, but there are not specific timeframe requirements for breakfast service. For this reason, reimbursable breakfasts could be offered during the high school mid-morning break.
- There are multiple breakfast models to consider if choosing to implement the SBP. Breakfast in the classroom is associated with the highest participation rates, which can be as high as 98 percent of the school's enrollment, and works best in elementary schools. Other service methods, such as Grab 'n Go and breakfast after first period also correlate with increases in participation. If breakfast is offered in a convenient way for students, they will participate in the program. Additionally, greater participation equates to more students being ready to learn, as well as higher levels of government reimbursement, which results in more revenue for the school.
- Refer to the [Serving Up a Successful School Breakfast Program](#) guide for an in-depth look at the various School Breakfast service models to determine which one(s) may work for the specific schools. Find additional information on breakfast, including meal pattern and menu planning tools, on the [School Breakfast Program](#) webpage (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).
- Please contact our School Breakfast Specialists Tracy Huffman, MS, RDN, CD at tracy.huffman@dpi.wi.gov and Hannah Snider, MPH, RDN, CD at hannah.snider@dpi.wi.gov for additional guidance.

Wisconsin School Meals Rock! School Nutrition Outreach Toolkit

- Wisconsin Team Nutrition has developed a [School Nutrition Outreach Toolkit](#) to assist school nutrition professionals communicate with students, families, and school staff about their programs (<https://dpi.wi.gov/wisconsin-school-meals-rock/school-nutrition-professionals/school-nutrition-outreach-toolkit>). This toolkit provides resources and tools for school nutrition professionals to effectively promote their school nutrition programs and showcase why Wisconsin school meals rock. This web-based toolkit contains a number of templates that can be customized.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding D:** There was a daily meat/meat alternate shortage at lunch on Monday of the week of review. Based on the total amount of beef crumbles used and the yield, the meat in the Meat Sauce recipe would credit as 0.75 oz. eq. meat/meat alternate. This is short of the daily requirement to offer 2 oz. eq. meat/meat alternate to students in grades 9-12.

Corrective Action Needed for Finding D: Submit a written statement explaining how this daily meat/meat alternate shortage will be corrected. If the recipe is to be altered, please include an updated amount of beef crumbles and total yield in the statement. If new products are added to the menu, please submit product labels and crediting information.

Repeat violations of a daily meat/meat alternate shortage during subsequent Administrative Reviews may result in fiscal action.

- ❑ **Finding E:** There was a weekly meat/meat alternate shortage at lunch during the week of review. Since the Meat Sauce offered on Monday of the week of review credited as 0.75 oz. eq. meat/meat

alternate, this resulted in a weekly shortage, with students having access to less than the minimum required ounce equivalents over the week. The final total amount of meat/meat alternate offered to students over the week will be assessed after all meal pattern information has been submitted (see next finding).

Corrective Action Needed for Finding E: This corrective action will be satisfied by completing corrective action for **Finding D**.

Fiscal action is required for select repeat violations found during an Administrative Review (AR). Because a weekly meat/meat alternate shortage was found during the last AR as well as the current AR, fiscal action will be applied. There will be a re-claim for the Meat Sauce meals that led to the weekly meat/meat alternate shortage. The following finding was documented from the School Year (SY) 2013-2014 Administrative Review, which is a repeat finding during the current AR:

- “Meat/meat alternate weekly minimums were not met during one week of the review period.”

Additionally, since the middle school students are served the same menu, fiscal action must also be assessed on the Meat Sauce meals served to this grade group. When errors are found in menus being served at multiple sites, fiscal action must be assessed for all sites, reviewed and non-reviewed, in which the non-reimbursable meals were served.

- ✓ **Finding F:** The BBQ Pulled Pork is being served and credited based on 4 ounces by volume, but needs to be served and credited based on weight. Until a weight can be obtained on the 4 ounces by volume of pork being served, the crediting of this item cannot be determined.

Corrective Action Needed for Finding F: Submit the weight of the 4 ounces (by volume) of pork being served. If this weight credits less than the daily minimum requirement of 2 oz. eq. for grades 9-12, submit a statement explaining how this product will be served in the future. If new products are added to the menu to meet the daily meat/meat alternate requirement, please submit product labels and crediting information.

If the ounce equivalents of meat/meat alternate offered in the 4 ounce scoop of pork contribute to the repeat finding of the weekly meat/meat alternate shortage, fiscal action will be applied.

**The Food Service Manager submitted the weight of pork served with the 4-ounce scoop prior to the exit conference. The pork weighs 4.6 oz. and credits as 2 oz. eq. meat/meat alternate. This satisfies the corrective action needed for this finding. No fiscal action will be applied to the BBQ Pulled Pork Sandwich meals served during the week of review.*

- ❑ **Finding G:** The signage for the pizza line did not explain what constitutes a reimbursable meal to students under Offer versus Serve and did not include the requirement to select at least ½ cup fruit or vegetable.

Corrective Action Needed for Finding G: Please add this information to the pizza line signage and submit a photo showing this update. Signage examples can be found on our [Signage Resources](#) webpage if changing the current signage is desired (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

- ❑ **Finding H:** Total milk usage is being recorded based on the total number of reimbursable meals each day rather than counting the total usage per meal. Since students are not required to select milk under Offer versus Serve, this method does not produce an accurate record of usage. With a

milk recipe on file, total milk usage for each meal should be recorded daily on the production record.

Corrective Action Needed for Finding H: Submit a statement designating the intention to either continue with the milk recipe and count actual total milk usage after each meal or record milk usage by type for each meal.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

3. RESOURCE MANAGEMENT

Non-Profit School Food Service Account

Commendations:

- The business manager does an excellent job managing the non-profit school food service account. Information requested about the account was provided quickly, was thorough, and was explained in detail.

Technical Assistance:

Excess Cash Balance

- The SFA has been operating with an excess cash balance. The business manager has taken the appropriate steps for an approved spend-down plan for the balance, as indicated in recent communications with DPI. New cafeteria tables have been purchased as part of the spend-down plan, with costs appropriately allocated to food service. During meal observation, it was noted that the new tables add visual appeal to the cafeteria and promote positive social interaction among students during meal times.

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 snapshot 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
- As a reminder, the unpaid meal charge policy is based primarily on local discretion. The policy can be updated as often as needed to ensure that unpaid meals are dealt with appropriately. Households must be notified of policy updates when they are made.
- The current unpaid meal charge policy contains language indicating that students leaving the district will only be refunded money left in their meal account if it is above \$5.00. This practice is not allowed, as all students must be refunded their full balance when they leave the district or graduate. 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>).

- The SFA should begin making efforts to refund all student balances, even if less than \$5.00, beginning this school year. Additionally, during the next update of the unpaid meal policy, edit the language pertaining to refunds to reflect this practice.

Findings and Corrective Action Needed: Non-Profit Food Service Account

- ❑ **Finding I:** The Annual Financial Report (AFR) had funds allocated incorrectly for the Wisconsin School Day Milk Program (WSDMP). The revenues reported for WSDMP appeared to contain payments from paid households for milk break, however the state reimbursement for the WSDMP is the only revenue that should be reported. Household payments for milk break should be recorded as non-program food revenue. Additionally, the expenditures for the WSDMP appeared to contain expenses incurred for providing milk to paid students. Milks sold to paid students at milk break should be included as non-program food expenses. The only expenses and revenues that should be recorded for WSDMP are those related to serving milk at milk break to the free/reduced eligible students.

Corrective Action Needed for Finding I: Please provide a detailed description to the consultant explaining how WSDMP revenues and expenditures will be reported on the AFR for the school year 2017-18.

Revenue from Non-Program Foods

Commendations:

- The food service manager does an excellent job providing and managing catering services. It is clear that catering events are priced appropriately to cover all costs and generate significant revenue for the meal programs.

Technical Assistance:

- Non-program 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.
- The USDA Non-program Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA non-program food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

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) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Findings and Corrective Action Needed: Non-Program Foods Revenue

- **Finding J:** The non-program foods revenue tool has not been completed for the current school year.

Corrective Action Needed for Finding J: Complete the [non-program foods revenue](#) tool using the five day reference period (DPI tool) or based on the entire school year’s information from the school year 2016-17 (USDA tool) to assess compliance with the revenue requirements (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>). Submit completed tool to consultant.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

Civil Rights Training

- While all staff required to have annual civil rights training completed the necessary training, sign in rosters indicated that the training occurred in February 2018. It is strongly recommended to provide this training at the beginning of the school year to ensure all staff members are aware of the civil rights considerations and requirements throughout the school year.

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 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 or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. Be sure that this is included in the district procedures to ensure compliance. As described in the updated permanent agreement, such complaints must also be sent to DPI within five days of receipt.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](#) resource.

Special Dietary Needs

- The SFA currently does not have a distinct procedure in place for accommodating special dietary needs. The information provided below should be used as guidance for accommodating such requests going forward. It is important to note that the food service director should receive copies of the signed medical statements submitted by households to ensure that accommodations are appropriate and comply with the statement.
- The SFA has several students with special needs that may also require special dietary accommodations. For these students, appropriate documentation must be retained by the food service director supporting accommodations that divert from the required meal pattern, otherwise incomplete meals would not be eligible for reimbursement. A signed medical statement or food/nutrition specifications outlined in the child's Individualized Education Program (IEP) are needed to accommodate these students. Please reference the USDA Q & A for [Accommodating Disabilities in the School Meal Programs](https://fns-prod.azureedge.net/sites/default/files/cn/SP26-2017os.pdf) (https://fns-prod.azureedge.net/sites/default/files/cn/SP26-2017os.pdf).
- 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf) 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs), 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, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal prices (\$0.00, \$0.40, \$2.95) were visible on the screen during meal service. Screen protectors were used to allow only cashiers, not students, to see the prices. While this setup prevents students from knowing other students' meal benefit status, it is recommended to change software settings to prevent cashiers from seeing this pricing information

as well. When switching to Skyward for the next school year, strongly consider utilizing settings to hide meal pricing information from the computer screen for cashiers.

Findings and Corrective Action Needed: Civil Rights

- Finding K:** While the public release was sent to the appropriate outlets within the required timeframes, the incorrect version of the public release was used and contained outdated income eligibility guidelines.

Corrective Action Needed for Finding K: Please provide a statement to the consultant describing how the correct version of the public release will be sent out for the upcoming school year.

- Finding L:** The menus do not contain the shortened non-discrimination statement.

Corrective Action Needed for Finding L: Update the menus so that the correct shortened non-discrimination statement is included. Provide a copy of the updated menu to the consultant.

- Finding M:** The food service page of the school website does not contain the full non-discrimination statement.

Corrective Action Needed for Finding M: Work with the appropriate staff members to update the food service webpage so that it contains the full non-discrimination statement, or a link to the full statement. Notify the consultant when the webpage has been updated.

On-Site Monitoring

Technical Assistance:

- The SFA completed the on-site monitoring form for the middle/high schools only, which are located in the same building and operate out of one kitchen and cafeteria. On-site monitoring was not completed for the elementary school because the food service manager (food service director in training) is located at the elementary school and has direct daily oversight for the elementary operations. This is an acceptable practice considering the setup of the schools and daily supervision provided by the food service manager.

Local Wellness Policy (LWP)

Commendations:

- The wellness policy is well developed and meets all requirements. It was clear when exploring the school website and speaking with the business manager about the wellness policy that the district is highly dedicated to student and employee wellness. The district does an excellent job putting the policy into action. Noteworthy initiatives include Family Fitness Nights, a bike to school event, and opportunities promoting staff wellness.

Smart Snacks in Schools

Commendations:

- It is great to see that the Alliance for a Healthier Generation calculator is being used! Keep using this tool to check every food and beverage sold to students during the school day for Smart Snacks compliance.

Technical Assistance:

- Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. More information is available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).
- Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

Findings and Corrective Action Needed: Smart Snacks

- ❑ **Finding N:** The following non-compliant products were found during the review of the a la carte items offered:
 - Whole Dill Pickle: sodium exceeds 200 mg
 - WG Maple and Blueberry Flavored Pancake Wraps: calories from total fat exceeds 35% and calories from saturated fat are not less than 10%
 - WG Corn Masa Nacho lil Bites: calories from saturated fat are not less than 10% for a serving size of 8 pieces
 - WG Cheddar Goldfish: sodium exceeds 200 mg
 - Uncrustable sandwiches: calories from total fat exceeds 35%

Corrective Action Needed for Finding N: Submit a written statement explaining the plan to bring all a la carte items into compliance with the standards.

Professional Standards

Commendations:

- It is clear the food service director, manager, and other staff are well informed on professional standards requirements. Care is taken to ensure that all food service staff receive the necessary training for their positions.

Technical Assistance:

Food Service Director Designation

- The online contract for the school year 2017-18 lists the food service manager (FSM), who was hired at the beginning of the school year, as the director. However, upon further discussion it was determined that the business manager/authorized representative has been designated as the food service director (FSD) for the current school year. The designated FSD was originally hired in 2006, so minimum hiring standards do not apply. The FSM did not meet the minimum hiring standards upon hire, and thus has been acting as the “FSD in training” for the school year. The FSM will have obtained the necessary requirements to be a FSD by the end of this school year through obtaining an Associate’s degree in business/management, completing one year of experience in school

nutrition, and holding a valid food safety certificate. On the online contract for the school year 2018-19, the current FSM can be correctly designated as the FSD.

- This change in FSD designation will require that the current FSM complete 12 hours of professional standards training next year. The current FSD has completed the necessary 12 hours of training for this school year, but will only need to complete 4 hours of training next year due to the change in responsibilities.
- The current FSD was able to show proof that 12 hours of training had been completed this school year, however this information has not been recorded in a detailed tracking tool. For the next school year, it is highly recommended that a tab be added for the current FSD/business manager/authorized representative on the existing tracking tool for the foods service personnel.

Food Safety

Technical Assistance:

- Temperature logs for the high-temp dishwasher have not been kept. Discussions with the food service manager indicated that this was addressed on the most recent food safety inspection and that plans are in place to begin monitoring and recording dishwasher temperatures.
- Hot food temperatures recorded on production records were not consistently recorded. Discussions with the food service manager indicated that this is an issue for which additional training will be provided.
- While process 1, 2, and 3 menu items are categorized on production records, a master list of menu categorization is not currently included in the food safety plan. During the next update of the food safety plan, a master list of menu item categorization should be added for each site's specific menu.

Findings and Corrective Action Needed: Food Safety

- ✓ **Finding O:** While the location of the posted food safety inspection is considered publicly visible, the most recent inspection report is not posted.

Corrective Action for Finding O: Replace the posted food safety inspection report with a copy of the most recent inspection report. Corrected on-site; no further action required.

Buy American

Technical Assistance:

- The USDA requires that a School Food Authority (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.
 - The following products may be exceptions to the Buy American provision: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
 - If no country of origin is identified on the label, the 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 be accepted in an email.
 - Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
 - Any non-domestic product delivered to the school, without prior, written approval of the Food Service Director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
 - Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
 - The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
 - Documentation for non-compliant products must contain the date the product was received, the product, the country of origin, and the reason for procuring the non-domestic product.
- 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>).

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

Technical Assistance:

School Breakfast Program Outreach

- The SFA does not currently offer breakfast at any schools. However, if the SFA adds a breakfast program, promotion of the program will be required to help encourage participation.

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 Rosholt 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](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>)

Resources:

- To access an inclusive map of all potential participating sites in the area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) 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 Needed: SFSP and SBP Outreach

Finding P: The SFA did not notify families of the availability of summer feeding programs in the surrounding area.

Corrective Action Needed for Finding P: Please provide a statement describing how the SFA will notify district families of summer feeding program availability for the upcoming summer.

5. OTHER PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations:

- The current and modified counting procedures that will be utilized in the next school year are designed in a manner that assures accurate counts and prevents overt identification of free/reduced eligible students.

Technical Assistance:

- Documentation must be retained that indicates the milk served in the WSDMP is all or partially produced in Wisconsin. According to the website for the milk brand provided in the program and the Wisconsin Dairy Plant directory, the milk served in the program is partially produced in Wisconsin. However, it is important to retain written confirmation from the supplier that the milk served is all or partially Wisconsin produced.

Findings and Corrective Action: Wisconsin School Day Milk Program

- ❑ **Finding P:** The WSDMP agreement on file with DPI is from 1990 and does not accurately reflect the current practices in place for the program.

Corrective Action Required for Finding Q: Please complete a new WSDMP agreement and submit to the consultant. Be sure to provide adequate details about the accountability and confidentiality procedures.

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).



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