

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

School Food Authority: Madison Metropolitan School District Agency Code: 13-3269

School(s) Reviewed: Schenk Elementary, Whitehorse Middle, West High, Hawthorne Elementary, Sherman Middle, Shabazz High, Neon-East Side and Memorial High schools

Review Date(s): February 12 – 16, 2018

Date of Exit Conference: February 16, 2018

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. 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 Madison Metropolitan School District (MMSD) for the courtesies extended to us during the on-site review and for being readily available to answer questions and provide additional

information; managers accompanied the DPI staff to school sites to explain the process and react to comments. 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. The school sites selected for documentation review and onsite meal observation were: West High School, James Madison Memorial High School, Shabazz High School, Sherman Middle School, Whitehorse Middle School, Schenk Elementary School, Hawthorne Elementary School and the program called Neon-East Side. Thank you to all of the staff at those locations for their kindness and ability to answer questions during the review.

The DPI review team appreciates the eagerness of the director, managers and office personnel at MMSD for their willingness to make changes to meet school nutrition program regulations. This district's staff is concerned for the nutritional well-being of their students as evidenced through food safety practices, menu choices, providing service in challenging physical locations, updating the local wellness policy with community input and maintaining continuing education. We were impressed during meal service that the staff was courteous and efficient in serving students nutritious meals. An enhanced partnership is developing with REAP local initiatives to operate mobile food truck at the high schools and during summer food service, with a focus on local foods.

School nutrition department communication materials are provided to households in languages to meet their needs. Translators assist when appropriate and are educated about the confidentiality of the application process for free or reduced price meals.

Several schools in the Madison Metropolitan School District are operating under the Community Eligibility Provision (CEP), providing free breakfast and lunch meals to students in those identified schools.

The DPI review team is confident that through the observations of this Administrative Review, MMSD will continue to improve their knowledge and operation of child nutrition programs.

Schenk Elementary/ Whitehorse Middle

Commendations:

- Whitehorse/Schenk Middle and Elementary Schools provided a beautiful and colorful presentation of meals and salad bar line.
- We observed students taking many fruits and vegetables. The staff was knowledgeable and very helpful to the students, even sending students back for more fruits or vegetables to complete their meal.
- When the MMSD school nutrition staff conducted the annual onsite monitoring, they corrected filed trip meal counting procedures.
- Tables were labeled as "peanut aware" for student use.
- Students volunteer with cafeteria clean up.

Technical Assistance:

- Pay attention to your food safety practices for all involved in the food service area, including the salad bar monitor.
- Students enter lunch serving area after recess. This presents some potential issues: wearing jackets are bulky in a tight serving area, the students are not coming in homeroom order which takes the cashier longer to pull up the teacher and mark the student. Perhaps students could enter as a class after placing coats at their classroom.

West High

Commendations:

- The staff members at West High School were welcoming, knowledgeable, and helpful in answering questions.
- The cashier at West HS for lunch in the gym did a great job making sure students took a reimbursable meal, asking them to take a fruit at the end of the line.
- Very friendly staff that interact with the students.
- The staff appeared to be well trained on Offer vs Serve (OvS) and were frequently observed directing students to take a fruit or vegetable to complete their meal.
- A variety of meal options were offered for breakfast and lunch at West High School to cater to diverse student preferences. The service line setup allowed students to pass through the lines quickly and select a customizable reimbursable meal to fit their tastes.
- The *Nourish line*, which is unique to West High School, seemed to attract a large number of students by providing chef-inspired entrees.
- The required USDA “And Justice for All” posters were placed throughout the serving areas.

Technical Assistance:

- There were a couple of non-reimbursable breakfasts due to the students going through the line quickly. They only have one POS; they could really use 2 POS lines for about 15-30 minutes when the rush comes through. This would help the one food service staff member out immensely, decreasing the chance of a non-reimbursable meal from getting missed/charging the student accordingly.

Hawthorne Elementary

Commendations:

- The 4K teachers pick up meals and take items to the classroom for service. The meal counts are emailed daily.
- Staff monitors students as they visit the attractive salad bar.
- This school has a “peanut aware” table for meals.
- The food safety plan was complete and observations indicated the staff adhere to the policies.

Sherman Middle/ Shabazz High

Commendations:

- Sherman operates CEP meal claiming and Shabazz does not, but they have systems in place to identify and count meals for each site.
- Meal serving staff are interactive with the students.
- Breakfast in the Classroom (BIC) seems to operate well.
- Food Safety Standard Operating Procedures (SOP) for applicable programs and operations were included in the site-specific food safety plan.
- Although the SOP states food temperatures will be taken, that was not observed when food was returned from classroom breakfast serving.

Technical Assistance:

- The posted food safety inspection report was outdated, but corrected onsite to the most current version.
- Although Sherman is CEP for claiming, if students select separate items, they must be charged for individual items not included in the reimbursable meal. This is difficult to do when there is a clicker for counts.
- Students asked permission to leave the classroom during BIC serving time to get a drink of water; water should be made available with complete access.

- Students placed unwanted foods in a general area, but the district does not operate a formal sharing table practice; communication is needed for those operating the meal service.
- Revise the signage at the salad bar to remove the note, “in order to have a free meal...”.
- The current food safety sanitation inspection report was not posted.

Neon – East Side

Commendations:

- The person doing the counting was doing things appropriately. It is a program with one-on-one staff per student. This grades 6-8 site uses a roster sheet.
- Since this is an Alternative Site, the cold package lunch only has a milk option for OvS.

Technical Assistance:

- The current food safety sanitation inspection report was not posted.
- Process forms in the food safety book were not found.
- Reviewer felt the food safety plan could use some updating, although SOPS seemed appropriate.
- Many days had a cooler temperature recorded at 41 degrees-please check thermometer calibration.

Memorial High

Commendations:

- Upon the visit to James Madison Memorial High School, it was noted that the staff present appealing meal options to students in a confined setting of the typical lunch serving window. They also sell meals at adjacent serving areas to serve many students in a defined time period.
- Students selected the fruit and vegetable offerings to complete their meals.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance/Compliance Reminders

- Five hundred ninety eligibility determinations were reviewed with only eleven errors identified.
- The information letter, such as the USDA template entitled [Letter to Parents/Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx) must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>).
- Horizon software was contacted for program case number digit length and parameters were established, giving an internal edit.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children’s status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.

- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Direct Certification

- Direct certification match runs are being conducted in the appropriate time frames. Typically, the district is running the match monthly and as need with new student enrollment.

Verification

Comments/Technical Assistance/Compliance Reminders

- During the verification process, the household must be contacted, usually sending the "We Must Check Your Application" letter.
- It was noticed that the required USDA nondiscrimination statement on the "We Have Checked Your Application" letter was incorrect. This will be corrected on the letter template.
- When the verification process is started, the confirming official's duties are to check the application for accurate determination, then sign and date the application or the [Verification Tracker form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>).

Public Release

- MMSD submitted the annual public release to many local news media agencies and grass root organizations.
- All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Employment Office

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for specific non-program purposes, such as athletic or testing fee waivers, field trip fees, etc. Consent must be obtained each school year.
- 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](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** Four students were found on the Benefit Issuance list as Free by income, along with one additional household member, but documentation could not be found to support that determination. The history showed that the software authorized the determination.

Corrective Action Needed: Please work with the software company and indicate appropriate benefits. If there is not documentation, the students must be changed to Paid status after completing the Adverse Action process.

- ❑ **Finding #2:** Four students were listed on the Benefit Issuance list as Reduced, along with two additional household members; however, they were receiving Free meal benefits, which was correct with documentation.

Corrective Action Needed: Please work with the software company to determine the cause and submit a statement of how it will be corrected. The students' meal status in the POS is accurate so no further communication must be given to the household.

- ❑ **Finding #3:** School and community persons with access to free and reduced data after given parental approval, need a [USDA disclosure agreement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) or other appropriate use form on file (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Corrective Action Needed: Submit a statement of the process used to comply with limited disclosure or free and reduced meal eligibility status for anyone working outside of food service, who is determined to need access to this information (e.g., IT, secretaries handling local fee waivers, staff handling state/federal reporting individual F/R data, community group administrator, etc.). The goal is to limit the number of people who need to know this information and make sure these individuals understand the consequences of improper sharing/release of this information.

- ❑ **Finding #4:** The *Letter to the Parents/Frequently Asked Questions* is not being distributed to all households as required. Since your registration process and communication with households is mostly electronic, this letter must provide alternative ways, sites, opportunities to complete an application for free or reduced meal benefits.

Corrective Action: Provide a statement of the process during registration where the required information from the [USDA template Letter to Parents \(Frequently Asked Questions\)](https://www.fns.usda.gov/sites/default/files/cn/SP34-2016a1.docx) (<https://www.fns.usda.gov/sites/default/files/cn/SP34-2016a1.docx>) will be distributed to all households.

- ❑ **Finding #5:** Applications submitted indicating an Other Source Categorical eligibility, such as Homeless, Migrant or Runaway, must be confirmed through other officials before meal benefits are provided to the student. Several online applications were noted with the Migrant or Homeless status marked. Many of these students were matched on the list from the district homeless liaison, but there wasn't a connection to a migrant education coordinator for confirmation of those meal eligibilities. Provide notification to households for the benefits, once confirmed.

Corrective Action: Provide a statement of the process to identify the online applications which indicate Other Source Categorical status categories and how they will be confirmed through other officials before meal benefits are provided to the student through the software.

- ❑ **Finding #6:** A few reviewed applications had income entered with correct frequency, but it was not indicated in the summary section at the top of the online application document. This could lead to improper eligibility determination.

Corrective Action: Contact Horizon software company for an explanation and correction to this problem. Submit a statement of the correct process.

Meal Counting and Claiming

Comments/Technical Assistance/Compliance Reminders

- During breakfast service at West High School, it was observed that a large volume of students came through a single Point of Service (POS) line in a very short amount of time. The small service area, single POS line, and high volume of students make it challenging for the cashier to ensure that every student has a reimbursable meal. On multiple occasions, the cashier needed to call out to students that had walked away with a non-reimbursable meal in order to offer them extra items to create a reimbursable meal, such as a fruit or juice. While the current system meets all requirements and is acceptable, it may be beneficial to add another serving line with a POS. This may help reduce the rush of students coming through the line at once, and thus make it easier for the cashier(s) to ensure every meal is reimbursable.
- During lunch service at Hawthorne Elementary School, the milk was initially past the point of service, but was moved prior to service, allowing meals to be claimed for reimbursement. The person responsible for POS was using two clicker counters, one in each hand, and determining whether a reimbursable meal had been taken for both lines. She also had to record or take cash for nonprogram food milk sold to students so it would be deducted from or deposited into their lunch account. This is a great deal of responsibility for one individual, as meals were observed going through that were not counted when the POS person was sending a student back to take more vegetable to constitute a reimbursable meal.
 - Although clickers can be used at the point of service for CEP sites, they tend to be inaccurate and lead to over or under claiming. DPI-SNT discourages their use and would encourage the use of a check-off process, popsicle stick or token exchange, finger scan, pin number, or card. The aforementioned systems also help prevent the claiming of second meals, which is unallowable.
 - For any CEP sites, an edit check is still required, which compares the total daily meal counts for breakfast or lunch to the attendance adjusted eligibles.
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Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #7:** At Hawthorne Elementary School, student CEP breakfast meals are counted using a clicker counter and a student does this process, which is an unallowable counting procedure. All counting and claiming must be done by an adult with knowledge of reimbursable meal pattern.
Corrective Action Needed: Please provide a statement of understanding that the person counting meals will be an adult with knowledge of reimbursable meal pattern.
- ❑ **Finding #8:** At Hawthorne Elementary School, the person responsible for lunch POS was using two clicker counters, one in each hand, and determining whether a reimbursable meal had been taken at each of the two lines. Meals were observed going through that were not counted when the POS person was sending a student back to take more vegetable to constitute a reimbursable meal and three non-reimbursable meals went through the POS which needed to be called back by the supervisor to take a full half cup of fruit or vegetable. This constitutes a systemic unreliable POS requiring fiscal recalculation. Please be mindful of how this process is operated at other similar school sites. Note: The lead consultant on this Administrative Review had not viewed the initial day of serving, so she went to view the serving period on 3/6/2018. There was some resolve as meal counts using one clicker matched manual counts; she would accept one clicker, but not two clickers from the server/cashier while counting reimbursable meals. Further concerns were noted with the server/cashier counting at a point before all the meal components were selected and the meal count is documented from the number of entrées used, rather than the clicker count.

Corrective Action Needed: Please correct the lunch point of service (POS) issue at Hawthorne Elementary School and submit this plan to DPI. After the POS issue is corrected, submit 30 consecutive operating days of clean counts. All NSLP meals served at Hawthorne Elementary School, from the beginning of the 17-18 school year, will be subject to fiscal action recalculation.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all of the school nutrition professionals of Madison Metropolitan School District (MMSD) for their warm welcome and cooperation during the Administrative Review. A special thanks to the Food Service Director and Food and Nutrition Coordinator, Managers, and Supervisor for providing documentation and answering questions prior to coming on-site, as this greatly expedited the review process. We appreciate your time and efforts. Thank you for all of your hard work and making your Child Nutrition Programs shine!

A special thanks to...

Hawthorne Elementary: The school nutrition professional at Hawthorne Elementary did an exemplary job providing fresh, quality, appealing meals to students. She batch cooks entrees for each of three meal periods. The salad bar at lunch was colorful and well-stocked with a variety of fruits and vegetables.

Memorial High School: The school nutrition professionals at Memorial do a great job of preparing and serving reimbursable meals to many students in a small space and in a short amount of time. The variety of entree items on the menu ensures that all students will find something they enjoy.

Neon-East Side: The one-on-one student to staff ratio made meal service time a positive experience for all. The pre-packed lunches looked fresh and appetizing. The staff philosophy and attitude are what truly make this program thrive. Thank you for the selfless work you do for your students and accommodating each student's individual needs.

Schenk Elementary/Whitehorse Middle School: The school nutrition professionals of Schenk/Whitehorse worked very well with students and school staff. We were impressed by the amount of school staff that supported the school nutrition professionals during lunch by helping students get through the line. The garden bar was colorful, fresh, and constantly replenished. Most of the entrees served were reimbursable meals in themselves, which made determining reimbursable meals easier for POS staff.

Shabazz City High: Lunch meal service was very impressive and ran smoothly. The school nutrition professionals did an excellent job of switching portion utensils between meal service times in order to serve Sherman Middle School students the 6-8 meal pattern and Shabazz City High the 9-12 meal pattern. Thank you for your efforts and dedication in meeting meal pattern requirements for these different age/grade groups.

Sherman Middle School: Thank you to the school nutrition professionals for their outstanding work with Breakfast in the Classroom (BIC)! There was excellent participation and it was great to see that detention students had the same opportunity to choose their breakfast from the BIC cart. The school

nutrition professionals had great rapport with students, making meal service a pleasant time for everyone!

West High School: The POS staff for lunch did a great job of making sure students took a reimbursable meal and prompted them to take a fruit at the end of the line, if needed. The menu provides a lot of variety for the students to choose from for lunch and breakfast, and staff were very friendly when interacting with the students.

Comments/Technical Assistance/Compliance Reminders

Fruit on Production Records

- During the week of review at West High School, the type of fruit served each day was not recorded on the production records. The specific types of fruit offered, along with planned portion sizes, must be included to document that the full required amount of this component was planned and served. Technical assistance was given on this prior to the onsite review, and by the time of the onsite review, fruit was being recorded correctly by type.
- Alternatively, you may choose to create a fruit recipe, in which fruit usage by type is tracked for one week and average usage is determined. If a fruit recipe is on file, fruit does not need to be recorded by type on production records. A fruit recipe must be specific to the site and to the meal being served, and should be updated twice per year or when it is noticed that students' preferences change.

Garden Bar Signage

- The garden bars observed at the schools of MMSD were impressive! Adding signage to the garden bars, especially in self-service with tongs, may be a helpful tool in assisting students in selecting a reimbursable meal. Signage may include a picture of what a ½ cup portion of strawberries, baby carrots, pepper strips, etc. looks like or may include how many pieces of each fruit or vegetable credits as ½ cup. Using pictures is especially helpful for self-service with tongs of leafy greens, since they credit as half the volume served. Consider posting a picture of a tray or boat with the planned portion of lettuce.

Standardized Recipes

- At West High School, nutrition professionals were preparing pear crumble and homemade croutons, but standardized recipes were not being used. Ingredients were being added without measurement. Remember, any menu item with more than one ingredient must have a standardized recipe, and these recipes must be followed exactly as written when the item is being prepared. More information on standardized recipes can be found on our [Menu Planning](http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>).
- Some of the standardized recipes reviewed contain incorrect crediting information based on the documentation provided. Below are a few examples of these crediting discrepancies. Please note that the crediting may change as recipes are updated and as products change.
 - Crunchy Asian Salad - listed as 2 ounce equivalent (oz eq) meat/meat alternate (M/MA), credits as 4 oz eq M/MA
 - 1 large egg credits as 2 oz eq M/MA, and there are two eggs on the salad
 - Crispy Chicken Strip Wrap - listed as 3.25 oz eq grain, credits as 3 oz eq grain
 - Giant Chicken or Beef Soft Shell Taco - listed as 3.25 oz eq grain, credits as 3 oz eq grain
 - Zesty Quinoa Salad - listed as 1 oz eq grain, credits as 0.75 oz eq grain

Production Records

- Remember that all production records must meet the production record requirements, which can be found on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). It is recommended that production records are checked periodically to ensure that all requirements are included on your template, and that all required information is consistently completed.

Condiments

- Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Condiments should have a planned portion size that is included in the dietary specifications. During meal observation it was noted that students took excessive amounts of condiments at Schenk Elementary/Whitehorse Middle School. Promote correct serving sizes by adding signage at the condiment station such as “Limit 2” or “Please take only 1.”

Updated CACFP Meal Pattern

- The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for school food authorities (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. More information regarding the updated CACFP meal pattern is available on 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 (MP)

- Finding #MP 1:** During the week of review in December 2017, the bread used for the ham and Swiss sandwich at Neon-East Side was not whole grain-rich (WGR). Foods that contain at least 50 percent whole grain meet the WGR criteria for school meal programs. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not WGR cannot be credited toward the grain component.
Corrective Action Needed: Please submit a nutrition facts label and ingredient list for a new WGR bread that will be used.
Corrective action submitted onsite. A 1.8 oz WGR Pillsbury Ciabatta roll is being used instead, which credits as 2.25 oz eq grain. No further action needed.
- Finding #MP 2:** The garden bar production records used at Hawthorne Elementary, Schenk Elementary, Whitehorse Middle School, Sherman Middle School, and Shabazz City High do not contain a column for planned portion size. Planned portion sizes are required for every meal component in order to ensure that the menu is meeting daily and weekly meal pattern requirements. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Please refer to the [Production Record Requirement list](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).
Corrective Action Needed: Please submit one week of completed garden bar production records for Hawthorne Elementary, Schenk Elementary, Whitehorse Middle School, Sherman Middle School, and Shabazz City High that contain a completed column for planned portion size.

- ❑ **Finding #MP 3:** During the meal observation portion of the onsite review, a total of 20 non-reimbursable meals were observed. In a few cases, the POS staff member instructed the student to select ½ cup of fruit or vegetable, but the student left the line without doing so. In other cases, the reminder to take ½ cup fruit or vegetable was not given to students.

Additionally, there was some confusion over the difference between Offer versus Serve (OVS) and the planned breakfast menu. At West High School, 1 oz eq cereal and 1 oz eq string cheese were offered as an entree option. At Sherman Middle School, 1 oz eq cereal and 1 oz equivalent graham crackers were offered as an entree option. Each of these foods counts as 1 food item at breakfast. Students must be offered both of these food items in order for the planned menu to meet the weekly meal pattern requirements. However, students do not have to select both food items to have a reimbursable meal. At breakfast, students must select 3 food items, including ½ cup of fruit and/or vegetable. At each of these sites, the POS staff member was requiring students who took cereal to also take the string cheese or graham cracker, even if they already had a reimbursable meal.

At Hawthorne Elementary, students were reminded milk is available, however, the language used implied that milk is a required component (e.g. “Take your milk,” “You forgot your milk”). Students must not be required to select milk as part of the reimbursable meal.

Overall, all POS staff could benefit from further OVS training. There is an [OVS webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) on the School Nutrition Team’s Training webpage that may be used (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>). It may be helpful to post reminder sheets behind the POS for staff to reference when identifying reimbursable meals.

The following non-reimbursable meals were observed:

- Hawthorne Elementary Breakfast - 3 (did not have full ½ cup of fruit and/or vegetable)
- Hawthorne Elementary Lunch - 8 (did not have full ½ cup of fruit and/or vegetable)
- Schenk Elementary Lunch - 1 (did not have full ½ cup of fruit and/or vegetable)
- Sherman Middle School Breakfast - 1 (only had 2 food items)
- Whitehorse Middle School Lunch - 2 (did not have full ½ cup of fruit and/or vegetable)
- West High School Breakfast - 3 (2 did not have ½ cup of fruit and/or vegetable, 1 only had 2 food items)
- Memorial High School Lunch - 2 (did not have full ½ cup of fruit and/or vegetable)

Fiscal action will be taken for these 20 non-reimbursable meals and is subject to the NSLP \$600 disregard as part of MMSD’s Administrative Review.

Corrective Action Needed: Please submit a detailed written plan explaining how you will ensure that all food service staff, specifically POS staff, are trained on OVS. Include who will conduct the training, what resources will be used, and when the training will be completed.

- ❑ **Finding #MP 4:** The spicy black bean burger offered during the week of review at West and Memorial High Schools does not have valid crediting information. There is a very similar version of the product that has a Child Nutrition (CN) label per USDA’s [CN Label Verification Report](https://www.fns.usda.gov/cnlabeling/usdausdc-authorized-labels-and-manufacturers), but the version of the product used by MMSD does not have a CN label or a Product Formulation Statement (PFS) (<https://www.fns.usda.gov/cnlabeling/usdausdc-authorized-labels-and-manufacturers>). Before and during the onsite review, the high school Food and Nutrition Manager worked extensively with their distributor to get correct crediting documentation, but the distributor was unable to provide accurate documentation. Without crediting documentation, a product cannot be credited towards the meal pattern requirements.

Since there is some amount of meat/meat alternate in the product (in the form of black beans) but we are unable to determine how much, there was a meat/meat alternate shortage at West and Memorial High Schools on Monday, December 11, 2017.

Fiscal action is required for any repeat violations at the SFA level (not site-specific) from the previous Administrative Review cycle. Because a daily meat/meat alternate shortage at lunch was found during the last AR (ham and cheese sandwich offered on the alternative high school menu at Work and Learn at MATC) as well as the current AR (black bean burger offered on both high school menus), fiscal action must be taken. The following repeat finding was documented from the School Year (SY) 2013-14 Administrative Review:

“The ham and cheese sandwich was short of the 2 ounce meat/meat alternate requirement. According to the recipe, the sandwich contains 2 slices of cheese, but it was prepared with one slice. As a result, this sandwich contribution to the meat/meat alternate was only 1.5 ounce equivalent.”

Per page 83 of the Administrative Review Manual, the State Agency has the discretion to reclaim meals containing insufficient quantities of the required meal components. This means that all meals containing the black bean burger on Monday, December 11, 2017, must be reclaimed at all MMSD high schools. This reclaim is subject to the NSLP \$600 disregard as part of MMSD’s Administrative Review.

Corrective Action Needed: Please submit crediting documentation for a new product that will be used instead of the spicy black bean burger.

Please note that repeat violations of a daily meat/meat alternate shortage during subsequent Administrative Reviews may result in fiscal action.

- ❑ **Finding #MP 5:** The Learning ZoneXpress banner signage used at multiple review sites states that students must select 1 fruit or vegetable, but it does not specifically list the OVS requirement of ½ cup fruit and/or vegetable. To ensure that students understand what they must select in order to have a reimbursable meal, this reminder must be added to the banner signs.

At Sherman Middle School, BIC cart signage did not have the required statement indicating that students must take at least ½ cup fruit and/or vegetable.

At Sherman Middle School/Shabazz City High, the signage posted on the garden bar is unnecessary and incorrect. Signage states that for a meal to be “free,” ½ cup fruit and/or vegetable (a boat full or a whole piece of fruit) must be selected. This is incorrect because a full boat may not be ½ cup fruit or vegetable depending on the food item (for example, leafy green vegetables credit as half the volume served, so a full boat may hold ½ cup that credits as ¼ cup). The signage also states that for a meal to be “free,” a student must select an entree option. This is incorrect because a student does not need to select an entree for a meal to be reimbursable. For example, a student may select a milk, a ½ cup of fruit, and a full portion of the vegetable offered. The Learning ZoneXpress banner signage is sufficient and explains how students can select a reimbursable meal, with the addition of the required statement that students must select ½ cup fruit and/or vegetable. Therefore, the signage posted on the garden bar is not necessary.

The garden bar signage also states that milk is only “free” when it is selected as part of the reimbursable meal. If you would like to include signage about milk, consider posting signage at the POS or on the milk cooler indicating that if students would only like to select milk, they will be charged the a la carte price.

According to the school nutrition professional onsite, there has been resistance from students on being charged a la carte prices if a full reimbursable meal is not selected. If you would like to include signage, consider posting signage at the POS stating that if a student does not select

3 components, one of which must be ½ cup fruit and/or vegetable, they will be charged a la carte prices.

At West High School, it would be helpful to have more signage to ensure that students know they are able to take a full cup of fruit and a full cup of vegetable. Since vegetables are pre-portioned into ½ cup servings, students should know that they can take two ½-cup servings if they would like.

Corrective Action Needed:

- a. Please submit a photo of the updated breakfast and lunch Learning ZoneXpress banner signs that includes the ½ cup fruit and/or vegetable requirement.
- b. Please submit photos of new signage for the garden bar at Sherman Middle School/Shabazz City High. If you choose to remove this signage entirely, please submit a written statement confirming that.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance/Compliance Reminders

- The AFR was completed thoroughly and included the separation of revenues and expenses for programs in different categories.
- This SFA manages their nonprofit food service account correctly per USDA regulations.
- 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 our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. Madison Metropolitan School District has met this requirement by creating a policy which has been communicated to household and those responsible for its enforcement. The district has chosen to continue offering the reimbursable meal when meal accounts are negative while keeping the collection efforts focused on the parents and guardians. MMSD also works hard to collect on negative accounts via frequent phone calls, emails, and establishing payment plans.
- Resources outlining the requirement for this policy may be found in DPI's [Unpaid Meal Charges In a "Nutshell"](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) or for a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>) and (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>),
- 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. The district is currently managing bad debt through outside donations, which is commendable, but this may not be a sustainable solution. Consider establishing a maximum negative balance, even if it is high, to assist in controlling the scale of unpaid meal charges.
- This district is following USDA regulation perfectly by transferring funds from the general fund or donations account into the nonprofit food service fund to cover the bad debt of negative balances when it is written off.
- Refunds 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](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf).

- If any balance is left in student accounts for a free or reduced status, the district must refund the balance when the account is closed.

Equipment

- USDA SY 2017 Equipment grant was released on January 23, 2018 and will be closing March 9, 2018. More information can be found on the [Equipment Grant](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) webpage (https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant).
- Equipment Pre-approval:
 - If the equipment cost is less than the capitalization threshold or it is identified on the Preapproved Equipment List, you do not need further approval from the School Nutrition Team.
 - If the equipment needed is not on this Preapproved Equipment List and the cost is greater than the capitalization threshold for your SFA, then you must complete a PI-6206 form and submit it to the School Nutrition Team for approval prior to purchase. The form and other resources can be found on the [Equipment Purchase Preapproval Process](https://dpi.wi.gov/school-nutrition/procurement/equipment-prior-approval) webpage (https://dpi.wi.gov/school-nutrition/procurement/equipment-prior-approval).

Paid Lunch Equity (PLE)

Comments/Technical Assistance/Compliance Reminders

- Thank you for completing the PLE tool each year and adhering to the pricing requirements. The SFA's current weighted average for 2017-18 SY tool is \$2.86.
- The PLE tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation. The school nutrition director anticipates a price increase for the 2018-19 School Year.

Revenue from Nonprogram Foods

Comments/Technical Assistance/Compliance Reminders

- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- 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).
- After the nonprogram food revenue tool was completed on site, the nonprogram food revenue ratio met the required USDA nonprogram food revenue ratio.

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.

- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).
- The adult lunch price quoted at the cash register was \$3.60, lower than the price stated on the contract of \$4.85. The \$4.85 was based on the highest student lunch price of a reimbursable meal at the high schools. The SFA needs to cover the cost of any reimbursements normally received for student meals, which adult's non-reimbursable meals do not receive. It is allowed to have tiered adult pricing for the regular lunch choices and a higher cost for premium meal choices.
- At the CEP schools, the price of \$3.60 is allowable because that includes all of the free reimbursements.
- A carton of milk is being sold for 50 cents. That is higher than normal. Please consider keeping the price of milk low for students and adults to purchase since it is a healthy component. It is not recommended to price milk high in order to keep adult or other nonprogram prices low.
- There has been conversation at contract time about the price of the adult breakfast meal and this will continue as contract renewal approval approaches soon. The adult price must cover the free reimbursement and all subsidies from a claimed meal. This current school year 2017-18, the breakfast adult price for the CEP schools would need to be \$2.17 or higher.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (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: Revenue From Nonprogram Foods

- ❑ **Finding #9:** A Nonprogram Food Revenue Tool was not completed for School Year 2016-17 or the current school year.

Corrective Action Needed: The Nonprogram Food Revenue Tool was completed on site. Please provide a statement of understanding that the nonprogram food revenue tool will be completed yearly per USDA regulation.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- The SFA includes the complete current nondiscrimination statement on the notification letters to households for the free and reduced meal application process.
- 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, only this 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.
- The USDA shortened version of the non-discrimination statement had additional language added by MMSD and MMSD replaced "this institution". Per FNS-113 Rev 1. States the following:

“d. For all other FNS nutritional assistance programs, State or local agencies, and their subrecipients, must post the following nondiscrimination statement (or current applicable revision) and include it, in full, on all materials regarding such programs that are produced for public information, public education, or public distribution. The authorized statements below or current applicable revisions cannot be modified. If a State authorizes additional language, it must be included in a separate statement.”

Clarification was received from the USDA regional office stating the nondiscrimination statement cannot be modified in any way, including using MMSD rather than “this institution”.

- Check the school nutrition webpage for the correct nondiscrimination statement on different links, including the home page and “about us”, free/reduced meals page and Summer Food Service Program page.

And Justice for All Poster

- “And Justice for All” posters are posted in public view where the program is offered.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually. This was completed and on file.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)

Overt Identification

- During observation of lunch service at West High School and Whitehorse Middle School, student meal prices were visible on the computer screens (i.e., \$3.00 or \$3.80, .40, 0.00). Because of the screen positioning, the cashiers and students can see the meal prices. This constitutes overt identification and must be corrected. The meal counting system must prevent overt identification of students receiving free and reduced price benefits.
- Consider whether the cashier needs to see the price being charged for the student or an identifying symbol according to the eligibility status of the student.

Processes for complaints

- MMSD has a process for receiving and processing complaints alleging discrimination within the school meals program. Determine whether the process includes school personnel to alert the school nutrition director if an allegation occurs.
- 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. The SFA must provide the complainant with the information necessary and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #10:** Special dietary needs accommodations are provided with inadequate documentation to support the requests. USDA requires that statements include information about the physical or mental impairment along with an explanation of what must be done to accommodate the child including foods to be omitted and foods to be substituted, as applicable. Several accommodations are provided based on statements that are either not signed by an appropriate medical authority (or not signed at all). Others were vague about what substitutions were required and some did not include a statement indicating how the disability restricted the diet. There are also numerous statements that do not include the name of the clinic or contact information for the individual making the request.

Corrective Action Needed: Submit a detailed statement indicating the steps the district will take to ensure that meal accommodations are made based on an appropriate medical statement. To ensure compliance, it is strongly recommended that the households be required to complete the medical statement on the district website. This [prototype form](#) includes all of the information needed to ensure that the statement is complete and accurate. Questionable applications need to be verified; however, schools should make every effort to accommodate the disability while waiting to obtain the needed clarifications.

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>)

Efforts should also be made to update the Special Dietary Needs page of the school website to include language that will assist households in understanding the district policy as it relates to special dietary needs.

Please note:

USDA regulations, [Memo SP-26-2017](#) requires that schools participating in the National School Lunch Program make meal accommodations for students with a signed statement on file from an authorized medical authority (<https://www.fns.usda.gov/sites/default/files/cn/SP26-2017os.pdf>). In WI, this means anyone that is licensed to write a prescription.

An appropriate medical statement must include:

- Information about the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet;
- An explanation of what must be done to accommodate the child; and
- The food or foods to be omitted and recommended alternatives, if appropriate.

- ❑ **Finding #11:** The USDA nondiscrimination shortened statement has modifications, please update this statement on all USDA material to "This institution is an equal opportunity provider".

Additionally, the Free and Reduced Meals page and the Summer Food Service Program page of the MMSD website do not contain the correct, full USDA nondiscrimination statement.

Corrective Action:

- Update all program materials using the USDA shortened statement to include only the line “This institution is an equal opportunity provider”. Please provide an example of a program material that has been updated.
- Add the nondiscrimination statement to the school meal program web pages listed above. Send a screenshot once complete.

- ❑ **Finding #12:** The computer screens utilized at the POS at lunch at West High School and Whitehorse Middle School display student meal prices for each price point (\$0.00, \$0.40, \$3.00 or \$3.80) which constitutes overt identification.

Corrective Action: Make adjustments to the POS display so that overt identification is prevented. If cashiers do not need to know which students are free, reduced or paid, student reimbursable meal prices should be removed from the POS display by changing the settings in the software system. If cashiers must know a students’ eligibility status, the screens should be positioned in a manner that prevents students from viewing the screen. Alternatively, screen protectors that conceal the display from easy viewing may be purchased and implemented or consider putting a strip of paper over the spot where the individual’s price appears. Provide the nutrition program consultant with photos showing how the overt identification has been corrected.

On-site Monitoring

Comments/Technical Assistance/Compliance Reminders

- Every school year, each SFA with more than one school must perform at least one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](#) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).
- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on our [Community Eligibility Provision \(CEP\)](#) webpage, under the resources for currently participating sites section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

Findings and Corrective Action Needed: On-Site Monitoring

- ❑ **Finding #13:** An on-site monitoring report was not available for lunch at Neon-East Side.
Corrective Action: Please send the completed missing On-site Monitoring form for School Year 2017-18 to the consultant. **Correct 3/8/18**

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

- The SFA’s draft Local Wellness Policy #4610 includes all required components; this policy is under review by the public and the district. Great work!

- It is recommended that language regarding Smarter Lunchroom Techniques be included in the policy. [Smarter Lunchroom Techniques](#) are effective and research-based and the Local Wellness Policy is a great place to identify your efforts, like encouraging student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices.
- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment, such as posting reviews, goals and developments on the website.

Resources:

- Please refer to the USDA [summary of the requirements](#) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](#) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Smart Snacks

Commendations

The Food and Nutrition Department should be commended for using the [Smart Snacks Calculator](#) to assess compliance of the foods and beverages it sells (<https://foodplanner.healthiergeneration.org/calculator/>). MMSD also has a wonderful Healthy Classroom Snack List on their website that helps parents and staff to select healthy options for classroom celebrations and also encourages non-food rewards.

Comments/Technical Assistance/Compliance Reminders

Food Marketing

The ice cream cooler at Whitehorse Middle School contains pictures of non-compliant products (e.g. Snickers Ice Cream Bar). The vending machine at Memorial High School contains pictures of a non-compliant 20 fl oz Gatorade. According to [SP 24-2017 Local Wellness Policy: Guidance and Q&As](#), food marketing commonly includes oral, written, or graphic statements made for the purpose of promoting the sale of a food or beverage product (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP24-2017.pdf>). Marketing standards apply to various equipment, such as the exterior of vending machines, menu boards, coolers, trash cans, and other food service equipment. Therefore, all food or beverage products depicted on items/equipment on the school campus during the school day must meet the Smart Snacks nutrition standards.

Findings and Corrective Action Needed: Smart Snacks (SS)

- ❑ **Finding #SS 1:** Sherman Middle School, Whitehorse Middle School, Memorial High School, and West High School have food fundraisers that occur during the school day that are not being tracked. For example, Sherman Middle School had a cupcake and cookie sale happening the day of the onsite review, Whitehorse Middle School allows students to sell non-compliant products a few minutes after the bell, and Memorial High School has a non-compliant popcorn sale weekly and

advertisements were posted, during the day of the onsite review, that stated there was a bake sale happening before and after school.

There are two situations by which an organization may sell foods and beverages to students during the school day. **The school day is defined as 12:00 AM to 30 minutes after the school bell.**

1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards:
 - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per student organization per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length.
 - b. Exempt fundraisers cannot occur in the meal service area during meal times.
 - c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. 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>).

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; SFAs have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Corrective Action Needed: Please submit a written statement explaining how exempt fundraisers will be tracked at Memorial High School, West High School, Sherman Middle School, and Whitehorse Middle School. Include specifics such as who will be responsible for tracking fundraisers and what type of tracking tool will be used.

- ❑ **Finding #SS 2:** Memorial High School is selling the following non-compliant products:
 - School store -
 - Clif bar- Crunchy Peanut Butter (first ingredient is organic brown rice syrup, not whole grain)
 - Belvita- Cinnamon Brown Sugar (calories exceed 200, sodium exceeds 200 mg)
 - Fiber One- Chocolate Fudge Brownie (first ingredient is wheat flour bleached, not whole grain)
 - Nature's Pantry- Blueberry Fig Bar (calories exceed 200, sugar exceeds 35% of sugar by weight)
 - SunChips- Original, 1.5 oz bag (calories exceed 200, calories from total fat exceed 35%)
 - Beef Sticks (calories from fat exceed 35%, calories from saturated fat are not less than 10%, sodium exceeds 200 mg)

- Skinny Pop- Popcorn (calories from total fat exceed 35%)
- Cheetos- Baked Flamin' Hot (enriched corn meal, not whole grain)
- Halls
- SweeTarts
- Milano- Dark Chocolate Cookies (first ingredient enriched wheat flour, not whole grain)
- Coffee shop -
 - 16 fl oz coffee with cream and sugar

Coffee and espresso drinks are all allowable beverages at the high school level, but products must be offered in acceptable portion sizes to be compliant with the Smart Snacks standards.

Accompaniments, such as cream and sugar, need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar need to be added together when determining if the beverage meets the guidelines below.

- Beverage Guidelines:
 - Calorie-free beverages (for black coffee only)
 - <5 calories per 8 fl oz; ≤10 calories per 20 fl oz
 - Maximum serving size: 20 fl oz
 - Lower-calorie beverages (for coffee with cream and/or sugar)
 - ≤40 calories per 8 fl oz; ≤60 calories per 12 fl oz
 - Maximum serving size: 12 fl oz

We recommend using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) to assess product compliance. 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.

Corrective Action Needed: Please provide a written statement confirming that the above non-compliant products will no longer be sold at school store and coffee shop at Memorial High School. Please also provide a written statement detailing your plan for ensuring coffee accompaniments meet Smart Snacks standards.

- ☐ **Finding #SS 3:** All Smart Snacks products sold by food service are compliant with the exception of the limon popsicle. The limon popsicle is not compliant because the second ingredient, after water, is sugar. All foods need to meet one of the Smart Snacks general standards and all of the nutrient standards in order to be compliant.

Corrective Action Needed: Please provide a written statement confirming that you will no longer order and sell the limon popsicle.

- ☐ **Finding #SS 4:** Documentation provided for the *Fresh Healthy Vending* machine snacks indicated non-compliant products are sold. The non-compliant products include:
 - Back to Nature- Honey Graham Sticks (first ingredient is unbleached wheat flour, not whole grain)
 - Stretch Island- Strawberry Fruit Leather (first ingredient is apple fruit puree concentrate, which is considered an added sugar)

Corrective Action Needed: Please provide a written statement confirming that these two products will no longer be sold in schools.

Professional Standards

Comments/Technical Assistance/Compliance Reminders

- 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.
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged.
- Staff who have not yet completed the required hours of training will have opportunities on staff development days to complete their requirements for School Year 2017-18 by June 30, 2018.

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

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

- The professional standards training tracker is well-organized, however, it is missing most of the employees' dates of hire. Also, it was unclear whether the employees listed under "FPC" were full-time or part-time. A new [USDA training tracker](https://pstrainingtracker.fns.usda.gov/) is available (<https://pstrainingtracker.fns.usda.gov/>).
- The non-foodservice employee working in Hawthorne's foodservice area (salad bar monitor) must be listed within the professional standards training tracker, and have both food safety and civil rights training.
- It should be noted on the tracking form who is conducting the training.

Water

Comments/Technical Assistance/Compliance Reminders

Water is required to be available without restriction at no charge to students during the lunch and breakfast meal services and during afterschool snack service.

Findings and Corrective Action Needed: Water

- ❑ **Finding #14:** While a water fountain is present in the cafeteria at Whitehorse/Schenk, trash cans and mop buckets with mops were placed in front of the water fountain. Storage of these items in front of the water fountain obstructs easy access to drinking water. Additionally, this may pose a potential food safety concern since the mop buckets and trash may house contaminants that may be transferred to the water fountain; the fountain is intended to provide clean, safe drinking water.

Corrective Action Needed: Submit a statement on how this will be corrected to ensure water is easily accessible and free from potential contamination at this school site.

Food Safety and Storage

Comments/Technical Assistance/Compliance Reminders

Food Safety Plans

- The master food safety plan kept at the Food Production Facility is extremely detailed and includes extensive site-specific standard operating procedures (SOPs) at the appropriate locations. It is clear that the quality assurance staff member takes the time to develop SOPs and maintain the information in an organized fashion.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- Many SOPs in the plan reference “potentially hazardous foods (PHF).” In the Wisconsin Food Code, the term “time/temperature control for safety food (TCS)” has replaced PHF. During the next review of individual SOPs or the food safety plan as a whole, consider updating the language pertaining to TCS foods.
- During meal observations at various sites, it was observed that some sites had milk served from bins/crates lined with ice, but in other sites did not have the milk kept on ice during service. It is highly recommended that all food service staff receive training on how to handle milk or other TCS foods served, in accordance with the sanitarian approved procedures. Because the milk is a TCS food served outside of mechanical refrigeration through this practice, a variance and approval from the local sanitarian is required to save and reuse any unserved milk. Discussion with the staff member in charge of quality assurance indicated sanitarian approval for serving milk outside of mechanical refrigeration and saving any leftovers that maintained an internal temperature under 41 degrees had been obtained. This staff member also indicated that a Leftover Milk SOP has recently been added to the master food safety plan, but had not yet been sent out to schools. Schools must each have a site-specific food safety plan with an SOP for all practices occurring at the site. See corrective action below.
- During meal observation at Schenk Elementary School, a school employee was helping serve and monitor the Garden Bar. It was observed that the individual had long, unrestrained hair that was hanging over the students trays throughout the service period. It is recommended that all people involved with service of food effectively restrain their hair in order to prevent hair from becoming a physical contaminant. Hair restraints should be utilized in accordance with the established site-specific SOPs and food service policies. Technical assistance was provided on-site regarding hairnets.

Food Employee Reporting Agreements

- The SFA properly retained signed agreements for each employee and kept them on file at the district office.
- While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Findings and Corrective Action Needed: Food Safety and Storage

- ❑ **Finding #15:** Several review sites were serving milk and other TCS foods (such as cheese sticks) outside of mechanical refrigeration and saving the leftovers if the temperature was found to be below 41 degrees at the end of service. This practice requires an SOP and sanitarian approval. The site-specific food safety plans at these sites did not contain the appropriate SOPs relating to this practice.

Corrective Action: Please submit a copy of the approved SOP that will be added to the site-specific food safety plans at all sites in the SFA where the practice described above is occurring. Additionally, please provide a timeline for when this SOP will be added to the site-specific food safety plans.

- ❑ **Finding #16:** The site-specific food safety plan at Schenk Elementary did not contain an SOP pertaining to Fresh Fruit and Vegetable Program (FFVP). It is recommended to check all sites which serve FFVP for inclusion in each food safety plan.

Corrective Action Required: Develop and submit an SOP for FFVP at Schenk Elementary.

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.
- 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.
- It is expected that the following products will require an exception to Buy American provisions: pineapple, mandarin oranges, olives, tuna, bananas and coffee.
- In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor.
- 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 within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- 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 the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be 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 as well as other labels.

- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/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](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
- 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](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

❑ **Finding #17:** The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Baking soda- Distributed domestically
- Quinoa – Peru
- Corn Tortillas – manufactured in IL
- Vanilla - Distributed domestically
- Grape jelly - Distributed domestically
- Lemon peel - Distributed domestically
- Paprika - Distributed domestically
- Pineapple tidbits – Indonesia
- Diced pears – packed in USA
- Black beans - Distributed domestically
- Suncups – NJ
- Ardmore Farms juice – OH
- Breaded chicken drumsticks - Distributed domestically
- French Toast Sticks – distributed MN
- Mr. Sips Gluten-Free meals – manufactured NE
- Parmesan cheese- distributed MI
- Romaine Mexico
- Broccoli – Mexico

At West HS:

- Olive Oil – Italy
- Canola Oil – no country of origin
- Sriracha – China
- Garden Seasoning – no country of origin
- Mrs. Dash – no country of origin
- Canned pears – no country of origin
- Canned jalapenos – no country of origin
- Frozen blueberries – no country of origin
- Frozen edamame – China
- Bananas – Costa Rica
- Honeydew – “imported”

At Memorial HS:

- Tomatoes – no country of origin (said “packaged in Mexico”)

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

Reporting and Recordkeeping**Comments/Technical Assistance/Compliance Reminders**

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. “LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach**Comments/Technical Assistance/Compliance Reminders**

- The SFA completed appropriate outreach efforts for both SBP and SFSP through a variety of outlets, including via email, mail, newsletters, and signs. Continuing to promote these programs frequently and creatively using some of the resources provided below may assist in increasing participation in these programs.
- More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](#) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>). A [Breakfast in the Classroom Toolkit](#) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).
- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](#) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Since MMSD participates in Summer Food Service Program, they provide outreach in a variety of methods through emails, backpack flyers, lawn signs, the June menu and website postings.

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snacks

Comments/Technical Assistance/Compliance Reminders

- Student athletes may participate in the Afterschool Snack Program (ASP) as long as there are other afterschool enrichment programs occurring the same day, which the athletes could possibly participate in, as when the athletes have practice or a game. This is referenced in the [Fact Sheet: Athletic Programs](#). It states, “Students who are part of school sports teams and clubs can receive afterschool snacks or meals as part of a broad, overarching educational or enrichment program offered by a school.”
- The meal pattern is different for certain grade groupings. The older students (ages 13-18) are allowed larger portions. They may be offered more than 2 components or larger portions of the 2 components, as long as it is deemed financially feasible by the SFA. However, only one snack may be claimed per student.

Average Daily Attendance

- The December 2017 Afterschool Snack Program (ASP) claim reported that over 17,000 students were participating in the ASP. This is incorrect as there are roughly 27,000 students in the district and 35 schools participate in ASP but the edit check does not support there being 17,000 students participating in the Afterschool Snack Program. **Please revise this average daily attendance number.**
- In the [ASP Q&A](#) under F-5 on page 13 it states that Afterschool programs should be maintaining a roster/check-list to be able to document the number of children in attendance of the afterschool program(s). This documentation should be kept to support the claim, as it asks for the average daily attendance of who is attending the afterschool snack program(s). Drop ins are allowed, but just keep track of who is in attendance no matter whether they take a reimbursable snack or not.
- For schools that have multiple afterschool enrichment programs, it may be best to have students come to the cafeteria afterschool to get their reimbursable snack, then go to their afterschool enrichment activity/program. Some afterschool programs keep attendance and some do not. At Memorial HS, for the MSCR afterschool programs, they use a Google spreadsheet to keep track of attendance for those afterschool programs. This is a best practice to keep attendance of the programs and can be shared with food service staff to use for the monthly claim.

ASP Meal Observation

- The staff operating ASP at Memorial High School were very positive when delivering snacks to different clubs.
- During ASP observation at West High School, discussions indicated unnecessary food waste may be occurring within the program. Specifically, the facilitator for the “PEOPLE” afterschool activity, where snacks are served, stated that previous instruction required all leftover snacks be thrown away at the end of service, including unopened, prepackaged snacks. This practice may result in significant unnecessary food waste. From a food safety perspective, most unserved unopened shelf-stable items may be returned to food service and served at a later time. It is highly recommended that the current practices for saving or throwing away leftover unserved snacks be reviewed by the food service management team, and the procedures be clearly defined and communicated to all those responsible for serving afterschool snacks. Clear communication with the afterschool snack and program facilitators may help reduce food waste.

- In addition to this, the 3rd afterschool enrichment program, Escalera, all snacks served were reimbursable and the coordinator did a great job making sure the students took a reimbursable snack. I asked her if she takes attendance, she said yes. However, she doesn't report it to anyone. She was writing down student's names on a piece of scratch paper that took a reimbursable snack. She had taken the snacks (milk pints and cinnamon chex) out of the refrigerator in the West HS kitchen around 3:30pm and put it back into the refrigerator at 4pm. The coordinator did not temp the milk when she put it back in the refrigerator.
- During ASP observation at Memorial High School, it was discussed that some leftover unopened, pre-packaged, unserved snack items are kept by the afterschool programs to serve as a snack option on the following days. The leftovers are not being returned to foodservice in all afterschool programs. While this practice is not out of compliance, failure to return wholesome leftover unserved snacks to food service may result in financial losses to food service over time. It is highly recommended that the process for recovering leftover unserved snacks be reviewed by the management team, and the procedures be clearly defined and communicated to all those responsible for serving afterschool snacks.
- During ASP observation at Sherman Middle School, staff were telling students they had to take a snack, even after the students denied it several times. Staff told the students they could put it on the back table in case other students wanted it. TA was given to the staff that students must be offered the snack but are not required to take the snack. Some students who did not want the snacks were offering their snacks to staff, though the staff denied the snacks. Additionally, there were similar practices regarding leftover snacks being reused as stated in above ASP observations.
- At Sherman Middle School a sharing table for served but unwanted, unopened afterschool snacks returned by students was observed during snack service. The SOP in the site-specific food safety plan for afterschool snack explicitly prohibits the use of sharing tables. However, in an effort to reduce food waste, a properly implemented sharing table may be an option for afterschool snack service. Because the majority of ASP items are pre-packaged and shelf stable, a sharing table may be implemented with relative ease, if desired. A corrective action pertaining to this topic is included below.
- Whitehorse Middle school has snacks delivered to about 20 classrooms. Perhaps the students could come out to select their snack off a cart in the hallway. Milk is left out of temperature control during this time.
- Schenk Elementary has students select the snack in the cafeteria and mark off the area eligibility number sheet.

Onsite Monitoring

- On-site monitoring for West HS "PEOPLE" program was done on 10/10/17 which was done during the 6th week of school. School started on 9/5/17 and the contract stated ASP started on 9/5/17 at West HS. It was not signed off on by the Afterschool Snack Program coordinator. It was only signed by the kitchen coordinator for West HS.
- On-site monitoring for West HS MSCR was done on 9/27/17 which was within the first 4 weeks of the program, but was not signed off on by the staff that administers the program. It was only signed by the kitchen coordinator for West HS. Also, it says there were no issues there and that snacks were being marked off as the students take them. That is not what was observed during our visit.
- On-site monitoring was not done for "Escalera" nor the "drumline" programs that we had witnessed take 6 snacks for those students.

Resources

- [Production Record Check Off Sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/assnacks_menu_prod_ct.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/assnacks_menu_prod_ct.doc)

- [USDA Q&A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/qanda-edition3-1999.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/qanda-edition3-1999.doc)
- [Athletic Programs Fact Sheet](https://dpi.wi.gov/school-nutrition/after-school#factsheet) (https://dpi.wi.gov/school-nutrition/after-school#factsheet).
- [ASP Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afterschool-snacks-meal-pattern.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afterschool-snacks-meal-pattern.pdf)
- [Crediting Grains](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-grains-handout.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-grains-handout.pdf)

Findings and Corrective Action Needed: Afterschool Snack Program

- ❑ **Finding #18:** At Whitehorse Middle School, the Afterschool Snack Program is offered in several classrooms daily. The POS is handled differently in each of the classrooms. Students that participate in an afterschool enrichment program have the option to take a reimbursable snack and must be marked off on a check off sheet as the student takes the two components of the reimbursable snack. The process of the POS appears to be inconsistent among the various classrooms participating in ASP. Technical assistance was provided on-site.
Corrective Action Required: Submit a statement on how the POS will be handled at Whitehorse moving forward.
- ❑ **Finding #19:** Production records with crediting information was unavailable for the reviewed Afterschool Snack Program sites.
Corrective Action Required: Provide [production records/check off sheets](#) for all afterschool school snack reviewed sites. **Satisfactorily corrected 3/8/18.**
- ❑ **Finding #20:** At Afterschool Snack observation at Hawthorne Elementary School and at West HS MSCR, it was noted that no POS was present. Students were given both snack components but snacks were not checked off or counted in any way. Students that participate in drumline at West HS also participated in ASP, but only one student came to get 6 reimbursable snacks and were not marked off. Students must be present to receive the reimbursable snack.
Corrective Action Required: Review the POS requirements with staff operating the Afterschool Snack Program. All students participating in the Afterschool Snack Program must be offered 2 full components and checked off on a POS sheet as they take the 2 components.
Submit a plan of action which includes training for Afterschool Snack Program coordinators responsible for the POS sheets.
- ❑ **Finding #21:** The production record check off sheets used at the POS were not available for all sites offering the Afterschool Snack Program to validate the December claim. After reviewing the check off sheets and Excel spreadsheet the SFA had available and used for submitting the December claim, it was determined that Afterschool Snack counting and claiming is a systemic issue SFA-wide and requires SFA-wide recalculation resulting in fiscal action to be assessed SFA-wide. Many days, for multiple schools listed on the SFA-wide snack counting spreadsheet had all snacks delivered to the site claimed every day constituting an unreliable and unallowable point of service.
Corrective Action Required: Conduct an On-site Monitoring for every Afterschool Snack site participating in the SFA and correct all POS issues. Each site must have staff trained to use the manual check-off sheet on the DPI website, and check-off sheets must be submitted to the office by the month with only one month of dates on each sheet, so monthly counts can be accurately tracked. After the POS issues are corrected SFA-wide, please submit two full months of these check-off sheets for each area eligible afterschool snack site in the SFA. From these two months of correct claiming data, all afterschool snacks served in the 2017-18 school year will subject to fiscal action recalculation and possible reclaim.

- ❑ **Finding #22:** Sharing tables were utilized at Sherman Middle School during ASP; however, the tables were not properly implemented and are explicitly disallowed in the district’s current Afterschool Snack Program SOP.
Corrective Action Required: Determine if sharing tables for ASP will be discontinued or modified to be brought into compliance as described above. Provide a statement describing how sharing tables for ASP will be handled going forward. If sharing tables will be continued but modified to meet the requirements, please provide a corresponding SOP.

- ❑ **Finding #23:** During ASP observation at multiple sites, TCS foods (such as milk, cheese, yogurt, etc.) were removed from mechanical refrigeration and served over the course of approximately one hour. Leftover unserved TCS foods were returned to food service coolers without having an internal temperature taken. The ASP SOP explicitly prohibits TCS food from being saved for future service if it was not held under mechanical refrigeration. If leftover TCS foods from ASP will be saved for future service, the sanitarian approved variance procedures for taking the temperature of TCS foods before saving must be followed. If time as a public health control will be utilized for leftover TCS items as described in the ASP SOP, all leftover TCS foods must be discarded at the end of service.
Corrective Action Required: Determine how leftover TCS foods will be handled in ASP going forward. Provide a statement describing how leftover TCS foods will be handled, including how this information will be communicated to all those responsible for serving afterschool snacks to students. Update the SOP for ASP as needed to reflect the actual procedures that will be followed for leftover TCS foods; submit a copy of the updated SOP, if applicable.

Fresh Fruit and Vegetable Program (FFVP)

Commendations/Technical Assistance:

Thank you to the FFVP Coordinator and Accountant for providing all documentation needed for the November claim validation prior to the on-site review. This greatly expedited the FFVP review process. It was noted that Madison Metro School District is working with REAP Food Group in order to provide local produce for FFVP snack and nutrition education. Thank you for your hard work and commitment to FFVP!

Fresh Fruits and Vegetables

Turnips were underclaimed due to what appears to be a discrepancy between distributor rounding versus Online Services rounding. The invoice for turnips showed 52.75# at \$3.50 per pound with a total cost of \$184.63. Turnips were claimed for \$184.62, underclaiming \$0.01. The unrounded cost is \$184.625 and Online Services rounded this cost down while the distributor rounded it up, leading to the underclaim. Online Services automatically calculates the total cost, but you are then able to delete that price and enter a price that is different than the one auto calculated by Online Services.

Operating Labor

Twenty-eight minutes of operating labor were claimed for labor completed on 12/1/2017 at \$9.00 per hour for an employee. Because Madison Metro School District consistently claims labor completed only during the claim month, this cost is unallowable because it is a December operating labor expense claimed in November. This unallowable cost resulted in fiscal action of \$4.23.

Only expenses obligated in a certain month may be included on that month’s claim. The definition of “obligation” for labor may be either the day labor is performed or the payroll date. Therefore, on a

given month's claim, SFAs have the ability to either claim all labor that was performed in the claim month or claim all payroll dates in the claim month. Since Madison Metro School District has 11 schools participating in FFVP, it may be easier to claim labor based on payroll dates for the claim month. For example, instead of claiming a payroll date of 11/10/17 on both the October and November claim and a payroll date of 12/8/17 on the November and December claim, consider claiming all payroll dates for the month of November on the November claim. Even though not all labor is performed during the claim month, this is the date during the claim month employees are compensated for their work. Therefore, this is allowable.

Food Safety and Sanitation

Schenk Elementary does not have a FFVP Standard Operating Procedure (SOP). An example of a FFVP SOP can be found on our [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety#templates) webpage (<https://dpi.wi.gov/school-nutrition/food-safety#templates>). If you choose to use the FFVP SOP on the website, please edit it to suit the needs of your operation. **Please see corrective action in Food Safety section of the report for FFVP SOP corrective action needed.**

The following observations were made during the FFVP on-site portion of the review. Please consider these observations when developing a FFVP SOP for Schenk Elementary and writing procedures, monitoring, and corrective action for the SOP.

- Most classrooms did not eat snack until about an hour later or more after delivery. FFVP snack was not covered nor was temperature of the snack controlled. While temperature was not a huge concern for the snack on the day of observation, this is a concern if TCS foods are served.
- While there is a dedicated preparation and clean-up area, this area does not contain appropriate equipment or tools needed for sanitation of prep space or FFVP snack bowls. There is a three-compartment sink in the school's kitchen that would be more appropriate for washing FFVP snack bowls. The counter space where FFVP is prepared should also be cleaned and sanitized with the proper equipment.
- The preparation area had gloves and a handwashing sink; however, hair restraints were not worn during FFVP prep.
- FFVP snack bowls were covered using parchment paper. Bowls were not completely covered and were exposed during delivery.
- Three students deliver FFVP snack bowls on carts. It is uncertain if students washed their hands before coming to deliver the carts. A piece of parchment paper on the cart shelves covered the bowls. Whenever students would walk with the cart, the parchment paper would fall off the cart onto the floor and be placed back on top of the uncovered bowls. Gloves and hair restraints were not used during delivery.

Leftovers

Per the USDA: "As with other school meal programs, plan to reduce waste. Follow your local board of health/local public health department guidelines for handling leftovers. If you cannot easily use the leftovers in the FFVP, you may be able to use them in your school meal programs -- but only to avoid waste. Plan to use the fruits and vegetables purchased with FFVP funds as part of the FFVP."

During on-site observation, it was noted by the FFVP preparer that sometimes Schenk Elementary receives additional bags of fruit or vegetable. In these cases, the FFVP snack preparer saves the additional FFVP snack to be served on another FFVP day during that week. The intention of the program is to serve the planned FFVP snack for the day on the planned day.

While observing FFVP service in the classroom, it was noted that classrooms had many leftovers in the FFVP snack bowl once the snack was distributed to all students. Extra snacks may be offered to students; however, there needs to be a fair way to distribute the extras. If there is only one kiwi half left, and 5 students would like more, how does the teacher determine who gets it? There may be times when it would be more appropriate to discard the items. It is not advised to regularly distribute extras unless everyone who wants more has access to more. It may become problematic at the school level if certain classrooms allow students to have extras regularly but other classrooms never or rarely have extras.

Consider the following ways in which leftovers can be reduced:

- While there is not a required portion size for FFVP, consider having a planned portion size to aid in ordering and distributing FFVP snack to reduce the amount of leftovers.
 - Having a planned portion size may also stretch FFVP funding so FFVP can run the entirety of the school year or additional service days can be added each week.
- To aid in figuring out planned portion sizes, consider having teachers track leftovers of FFVP snack for 1-2 weeks. From these numbers, average student consumption of fruits and vegetables can be figured into a portion size.
- Consider pre-portioning the FFVP snack so each student receives the amount that was intended for them when it was ordered.
 - Having pre-portioned snacks can also help with food waste because each classroom will know how many pre-portioned snacks they need, even in the case of a student being absent. *Please refer to the USDA guidance above on leftovers as food items not taken out of time or temperature control can be reused.*

Findings and Corrective Action Needed- FFVP:

- ❑ **Finding #FFVP 1:** Documentation provided to validate the November 2017 FFVP claim for Schenk Elementary resulted in a finding of a \$0.01 underclaim due to Online Services rounding differently than the distributor rounded on the invoice. This underclaim is subject to the NSLP \$600 disregard as part of Madison Metro School District's Administrative Review.

Corrective Action Required: Provide a written statement confirming understanding of being able to change the total cost in Online Services if the total cost differs from what is on the invoice.

- ❑ **Finding #FFVP 2:** Documentation provided to validate the November 2017 FFVP claim for Schenk Elementary showed that December operating labor was claimed in November. This expense resulted in fiscal action of \$4.23 and subject to the NSLP \$600 disregard as part of Madison Metro School District's Administrative Review.

Corrective Action Required: Provide a written statement confirming understanding that only expenses obligated in a certain month can be included in that month's claim.

The total amount of fiscal action is \$4.22 based on \$0.01 underclaim, and \$4.23 of unallowable costs. Fiscal action of \$4.22 for FFVP is subject to the NSLP \$600 disregard as part of Madison Metro School District's Administrative Review.

- ❑ **Finding #FFVP 3:** FFVP snack is brought to the nurse's office to be distributed to students. Middle school students have access to FFVP snack.

Corrective Action Required: Provide a written statement confirming understanding that only enrolled elementary school students can have access to FFVP snack.

6. COMMUNITY ELIGIBILITY PROVISION (CEP)

Comments/Technical Assistance/Compliance Reminders

- A special thank you to the food service director and support staff for meeting with the CEP specialists to discuss the upcoming 18-19 SY CEP application process. As a reminder, CEP applications can be submitted anytime after May 1st and are due June 30th, 2018. An application should include any school in the fourth year of CEP that wishes to begin another 4-year cycle. If sites are no longer eligible (e.g. programs) or are not included on the new CEP application, they will be required to return to standard counting and claiming. Sites currently in cycle year 1, 2, or 3 are not required to re-apply, but may do so if the agency feels it would be advantageous.
- Continue projecting the identified student percentages by school code prior to the final run date by using the “*Individual School Match Report*” now available to SFAs through the DC system. When putting together the final CEP application, make sure to run direct certification for the full enrollment on or slightly before April 1. This run may be used as the student roster.

Online contract updates and CEP

- In the 18-19 SY, SNT will only recognize DPI schools on Schedule A of the online contract. This means that programs cannot participate in CEP as their own site. They should be included and counted within the school where they are enrolled.

Annual Intent Form

- For any site currently in year 1-3 of the CEP cycle, an annual intent form will need to be submitted. This form should notify DPI SNT of any significant changes to participating sites. For example, school name changes, school openings and school closures. CEP sites year-to-year, should always match the online contract.

Records Retention

- As a reminder, LEAs/schools must retain records used to develop the ISP (e.g., records for the initial CEP election year showing numbers of identified and enrolled students, and records from any updates made to the ISP) during the entire period CEP is in effect, including all extensions. In addition, this documentation and all other documentation must be retained for three years after submission of the final Claim for Reimbursement for the last fiscal year of CEP. If audit findings have not been resolved, these records must also be retained beyond the three-year period as long as required for the resolution of issues raised by the audit.

Transfer Students

- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019. 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. For CEP, this means checking the [list of participating CEP schools](#) on the DPI SNT website and attaching a copy of this list to transfer records.
- A [transfer student flow chart](#) and [template letter](#) can be found on the CEP SNT website.

Qualifying for Other Programs and Funding

- When qualifying for other child nutrition programs, the *individual* school ISP X1.6 is used in place of student meal application data or the group ISP. For a chart outlining how a CEP site qualifies for

various programs, see the CEP website under Resources for Currently Participating Sites→ [Use of the Individual ISP](#).

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

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

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



With School Nutrition Programs!