

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Monona Grove School District

Agency Code: 13-3675

School(s) Reviewed: Winnequah Elementary

Review Date(s): 2/6/18–2/7/18

Date of Exit Conference: 2/7/18

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

Appreciation/Commendations/Noteworthy Initiatives:

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

The Food Service Director was extremely organized, thorough, and knowledgeable. The information provided in advance to the on-site review was much appreciated and supported a successful review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

267 eligibility determinations were reviewed, 3 errors were identified. With minimal errors, fiscal action will not be assessed. Keep up the good work!

Commendations/Comments/Technical Assistance/Compliance Reminders

Transferring 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.

Independent Review of Applications

LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year.

Monona Grove School District had a 1.12% certification error rate and will *not* be required to conduct independent review of applications.

Disclosure

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. Disclosure agreements must also be on file for anyone outside of food service receiving eligibility information for state and federal reporting. 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:** Students listed on the SFA-1 and SFA-2 forms are incorrectly certified for free and reduced-price meal benefits.

Corrective Action Needed: Where applicable, send a letter of adverse action (decrease in meal benefits) to the households, notifying them of the review findings. Provide 10 *calendar* days for the

household to appeal prior to changing the meal status in the point of sale system. If there is no response, the benefits change on the 11th calendar day. If the household appeals, continue the same meal benefit until the appeal is resolved. Provide the consultant with a copy of the letter of adverse action and a copy of the SFA-1 and SFA-2 forms with the “date of correction” column completed **Corrected onsite. No further action needed.**

Verification

LEAs are encouraged but not required to conduct additional follow-up if a household fails to provide adequate documentation after the first required follow-up. If the household does not respond or fails to provide adequate documentation after the required follow-up (and, if applicable, additional follow-ups), verification is considered complete for the household when notice of adverse action is sent. See page 112 of the Eligibility Manual for School Meals for more information.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- The Food Service Director was able to easily answer all questions related to the edit checks and claims. After discussions with the director and reviewing the necessary documents, it was clear that the claiming processes are accurate and meet all requirements.
- When reviewing the edit checks for the month of review and comparing them to the claim for reimbursement, inconsistencies in the number of operating days were found. The actual number of operating days for each meal program at each site should be entered when filing the monthly claim. Site-based claiming allow for different numbers of operating days to be entered for each meal at each site. Technical assistance was provided.
- Please note that SFAs may claim school aged visiting students in the paid category or the individual’s category with documentation, unless they are from a CEP school.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the FSD for timely communication and excellent documentation. The FSD’s cooperation and efforts are greatly appreciated. USDA Certification of Compliance Worksheets showed that reimbursable meals are being served during the week of review- no errors were flagged.

All food components had correct documentation. Standardized recipes and menus are completed correctly. Menus are thorough, appealing, and contain all necessary statements. Thank you for clearly indicating the number of items each offering at breakfast counts as. The pork, nut, and egg statements go above and beyond to accommodate for students at Winnequah Elementary.

The cafeteria and nutrition professionals at Winnequah Elementary created a relaxed, educational, and enjoyable atmosphere for students at lunch. Students were encouraged to serve themselves fruits and vegetables and to deposit their lunch cards in the line. These practices encourage responsibility. “Silent lunch” at the end of the period is a great idea that allows students to socialize for the majority of the period, but also encourages students to focus on finishing their food toward the end of the meal.

Comments/Technical Assistance/Compliance Reminders

- Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. SNT recommends maintaining and organizing this information in a manner that is easy to

reference and update, such as a binder or file folders divided into categories. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted. The Product Formulation Statement for Frito-Lay Munchies Munch Mix Snack Mix served at breakfast on 12/20/2017 is out of date and incorrectly states that the product does not meet the Whole Grain-Rich Criteria. Please contact your distributor for an updated PFS for this product. Alternatively, [Frito Lay PFSs](#) are available (<https://www.pepsicoschoolsource.com/images/content/All%20PepsiCo%20Products.pdf>). Please replace your Munchies PFS on file with a correct and updated PFS. *TA provided and corrected prior to onsite review.*

- Portion sizes served must be full, level scoops in standardized measuring utensils. Baby carrots are portioned into 4 fluid ounce cups (4 oz spoodles). The cup cannot be completely filled due to the awkward and oblong shape of carrots. A full ½ cup of carrots must be included in the portion cups to be considered the ½ cup vegetable required to be offered with the reimbursable meal. We recommend counting out baby carrots as you dice and put them in the 4 oz spoodle. *You only need to dice and count the carrots once.* Make note of how many carrots it took to fill the 4 oz spoodle in diced form. *You will not have to dice the carrots again in the future.* We are looking to see how many diced baby carrots it takes to fill a 4 oz spoodle (1/2 cup). Then, in the future you may serve whole baby carrots using a server of your choice (tongs, spoodle, gloved hand, etc), as long as X-many (the number you determined) baby carrots are served to credit as ½ cup Red/Orange vegetable. *TA provided and corrected prior to onsite review.*

- Some meat/meat alternates do not credit ounce-for-ounce because they contain ingredients other than meat (e.g. water, fillers, breading). For example, Brookwood Farms Pit-Smoked Pork #12307 credits as 2.0 ounce equivalents (oz. eq.) for every 4.0 ounces by weight, according to CN label. In order to serve 2.0 oz eq, you need to weigh the meat using a scale. Serving the meat in 1/2 cup (#8 disher or 4 fl. oz.) measures volume, not weight. Therefore, 1/2 cup meat (#8 disher or 4 fl. oz.) does not ensure that 4.0 oz of meat by weight is being served. *Prior to service, verified that 1/2 cup (#8 disher or 4 fl. oz.) of Brookwood Farms #12307 does weigh 4.05 oz.*

- The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. 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](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). During the onsite review the breakfast cart stopped at classrooms, which distinguished the students by grade. Since 4K students can be distinguished at POS, this situation is not comingled. 4K students must follow the CACFP meal pattern. Alternatively, in a comingled situation 4K students could be served with K-5 students if they are unidentifiable by grade at the Point of Sale. For assistance with the CACFP meal pattern, contact Erin Opgenorth RDN, CD at erin.opgenorth@dpi.wi.gov or 608-266-5185, or Tanya Kirtz at Tanya.kirtz@dpi.wi.gov or 608-266-2410.

- The School Breakfast Program is being promoted at Winnequah Elementary, but referred to as “snack.” It is strongly encouraged that educational staff at Winnequah Elementary promote the SBP as being “breakfast” or “morning meal” as opposed to “snack.” This informs parents that breakfast is served at school, and will prevent students from unnecessarily consuming breakfast both at home and at school.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding #1:** Production records are intended to be useful tools to record information prior to production, during production, and following production. The production record template currently in use is missing required information:

- Grade grouping
 - Consider adding “grades K-5” next to “site #002 Winnequah” or “A: Elementary Breakfast/ B: Elementary Lunch”
- Total number of purchase units
 - Consider splitting the “prepared total” column into “prepared servings” and “prepared purchase units”

While there is no required production record template, there are some examples that may be used 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>). A copy of the production record requirements (“Must Haves and Nice to Haves” list) can also be found at that link.

Corrective Action Needed: Submit one breakfast and one lunch production record template for Winnequah Elementary with all required information.

❑ **Finding #2:** It is required to post signage visible to the students that indicates the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable.

- The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, *one of which must be at least ½ cup fruit, vegetable, or a combination of fruit and vegetable.*
- The breakfast signage should list the three components and the four items offered, and must communicate to students that under Offer versus Serve, they must select at least three food items, *one of which must be at least ½ cup of fruit, vegetable, or a combination of fruit and vegetable.*

Prior to lunch meal service on 2/6/2018 signage was missing the “1/2 cup fruit and/or vegetable” statement.

If you are interested in ordering signage from SNT, please visit the [Team Nutrition](http://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

Corrective Action Needed: Add statement to breakfast and lunch signage that 1/2 cup fruit and/or vegetable must be selected to make a reimbursable meal. *Corrected on-site prior to service; no further action required.*

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

- While the district is to be commended for the fiscal viability of the program, federal regulations limit net cash/fund resources to an amount not to exceed a three month average operating expenditures. The state agency will be contacting the district to spend down funds and invest in food service programming. Consider eliminating the reduced-price charge or improving the quality and/or variety of foods offered.
- The Annual Financial Report is completed perfectly. All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and other) are

separated by program. Nonprogram revenues and expenditures are separated from program revenues and expenditures.

Paid Lunch Equity

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. The SFA's current weighted average for 2017-18 SY tool is \$2.86.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- When reviewing catering invoices and related ledger entries, it was apparent that the processes used for managing the catering services are effective and meet all requirements. The requests for catering, invoicing, and payment procedures are excellent.
- The nonprogram food revenue tool was completed for 5 consecutive operating days using food cost per serving calculations and software transaction summary reports. The tool documents that the agency is pricing nonprogram foods adequately (to cover all cost) and is meeting the revenue ratio requirement. Great job!

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

"And Justice for All" posters need to be posted in public view where the program is offered. While the poster at Winnequah Elementary was posted in an area accessible to the public, it was hung behind a counter in the food serving area and may be better displayed out in the cafeteria.

On-site Monitoring

Monitoring reviews are completed as required. It is clear that the director makes frequent site visits and is using the on-site monitoring forms to guide program management.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

The local wellness policy final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017. At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.

- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.
- An assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Resources:

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

Findings and Corrective Action Needed: Local Wellness Policy

✓ **Finding:** The SFA's local wellness policy (po8510), which is the active board policy, meets some but not all requirements as stipulated above.

Corrective Action Required: Provide a timeline for updating the policy to become compliant with the final rule.

A committee made up of parents and various staff member at Monona Grove SD has recently been established. They worked to update policy number po8510, (last updated in February of 2017), but the draft is not the active policy. The draft was provided to reviewer offsite, which is now compliant with all the minimum requirements and will be presented for board approval. Site coordinators have been established to monitor policy implementation. **This corrective action is considered complete. No further action needed**

Smart Snacks

Thank you to the Principal and FSD for prompt communication regarding competitive food sales.

Comments/Technical Assistance/Compliance Reminders

- At the time of the on-site review there were no competitive foods or beverages sold at Winnequah Elementary. If multiple grades were to have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks). We recommend using the [Alliance for a Healthier Generation Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) to assess product compliance (https://foodplanner.healthiergeneration.org/calculator/).

Professional Standards

The agency is in compliance with director hiring standards and is tracking annual training hours for all staff who work with the food service program. Additional staff trainings yet this school year will cover updates to the food safety binders, offer versus serve, and portion control. Keep up the good work!

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Buy American

Thank you to the FSD for keeping a thorough, organized, and current binder of Noncompliant Product Documentation. Continue to monitor products for Buy American compliance and update this binder as needed.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan. SFAs are responsible for contacting the local regulatory authority to request inspections in order to ensure that two required inspections are conducted each school year.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible. While the most recent inspection report at Winnequah Elementary was posted in an area accessible to the public, it was hung behind a counter in the food serving area and may be better displayed out in the cafeteria.

Temperatures

All temperature logs were available for review and demonstrated that the staff at Winnequah Elementary take care to monitor food and equipment temperatures daily.

Food Safety Plans

The food safety plan was available at the reviewed school, however the plan had not been updated recently and was missing some information. The Food Service Director provided a copy of the updated food safety plan for the SFA as a whole, including site-specific information for each school site. This updated plan is set to be reviewed with staff and implemented later in the month of review. This updated plan contained all required elements, including detailed standard operating procedures (SOPs) for various topics.

Findings and Corrective Action Needed: Food Safety and Buy American

- ✓ **Finding:** Winnequah Elementary has not yet had a food safety inspection during the current school year. The local regulatory authority has not been contacted to request an inspection.

Corrective Action Needed: Please contact the local regulatory authority to request a food safety inspection. Provide the Nutrition Program Consultant with proof that an inspection has been requested. **Completed onsite. No further action required.**

Summer Food Service Program (SFSP) Outreach

Technical Assistance/Compliance Reminders

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at this SFA, USDA requires

all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the summer meals locator on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'Summer Meals' to 877-877 to find Summer sites
- Promotion of the [USDA Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action Needed: SFSP and SBP Outreach

Finding: SFSP outreach was not completed.

Corrective Action Needed: Please provide a statement outlining how the SFA will inform families of the availability of SFSP for the upcoming summer and going forward.

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

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

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

