

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

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**School Food Authority: Butternut School District**

**Agency Code: 20840**

**School(s) Reviewed: Butternut Elementary**

**Review Date(s): 11/28/18-11/29/18**

**Date of Exit Conference: 11/29/18**

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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 for \$10 for the week. 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](#) 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 Butternut 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.

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Certification and Benefit Issuance**

##### Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Applications with a program number must have a program name. Without both of these, the application is incomplete.
- Applications with income listed, must have a social security number listed or the boxed checked for no social security number.

##### Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

##### Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). 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 Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

## **Verification**

SFA had to verify one family. The household provided supporting documentation to keep their eligibility. While on review, the documentation could not be located. SFA was able to explain the verification process to Nutrition Program Consultant. Verified household was found on direct certification as free after verification was completed.

Verification Collection Report was completed for the 2018-2019 SY.

## **Meal Counting and Claiming**

Meal counting and claiming was accurately reported. Edit checks were used.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations:**

Thank you to the staff of Butternut School District for their warm welcome, cooperation, and time during the Administrative Review. A special thanks to the Food Service Director and the Superintendent for providing documentation prior to coming on-site. The school nutrition professionals are friendly and have great rapport with the students. During the pre-K-5 service, there is an additional staff member that helps the younger students select and dish up fruits and vegetables. This is an excellent practice and helps students get through the line faster. The condiment signage at the end of the line is another great practice that was observed. In addition, the kitchen is extremely clean and organized, and it is a welcoming environment for students. We enjoyed our time at Butternut School District. Thank you for your hard work and dedication to your School Nutrition Programs!

### **Technical Assistance:**

#### *Meal Pattern*

It is reported that a K-5 and 6-8 meal pattern are used at Butternut School District. However, both the K-5 and 6-8 students are receiving the same menu items and portion sizes. Rather than having a K-5 and 6-8 differentiation on production records, it may be beneficial to simplify and use a K-8 meal pattern and have K-8 students recorded on one section of the production record, instead of writing the same information for K-5 and 6-8 twice.

A K-8 meal pattern makes menu planning easier for school nutrition professionals and Offer Versus Serve (OVS) can continue to be implemented to minimize food waste. More information on meal patterns and menu planning for NSLP is available on the DPI [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

#### *Crediting Foods in School Meals Programs*

The [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) for School Meals Programs contains yield and crediting information for foods with standards of identity, in large part, unprocessed foods (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Foods that do not have standards of identity are not listed in the *USDA Food Buying Guide* and require further documentation, such as a Child Nutrition (CN) label or a product formulation

statement (PFS) clearly detailing the ingredients and their creditable quantities, in order to be served in School Meal Programs.

A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that includes these four things.

When a CN label is not available for a product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is required that this documentation is printed on company letterhead and signed by an appropriate person.

If USDA Foods are utilized, [USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets) can be used as crediting documentation (<https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>).

Grain products can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). If a product is not listed in Exhibit A, you must obtain a signed PFS from the manufacturer that lists the *grams of creditable grain* in the product.

**If a product does not have a valid CN label, PFS, USDA Foods Product Information Sheet, cannot be found in the USDA Food Buying Guide for School Meal Programs, or cannot be credited using Exhibit A, it may not be credited when served as part of the USDA School Meal Programs.**

#### *Crediting Documentation Record Keeping*

Some documentation submitted for the week of review is not considered valid crediting documentation, such as product specification sheets submitted for corn dogs, pizza, etc. Documentation was available on-site for some products and CN labels for other products were able to be found on the boxes in storage.

Because 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. These records should be reviewed and updated, if needed, at least twice per year and as new products are purchased or substituted.

#### *Breakfast Signage – Food Items*

Under OVS for the breakfast meal pattern, four food items must be offered, but only three food items, one of which is ½ cup fruit, vegetable, or combination, must be selected in order for the meal to be reimbursable. A food item is defined as 8 fluid ounces (fl oz) of milk; ½ cup of fruit (or ½ cup of vegetable can be substituted for fruit) and 1.00 ounce equivalent (oz eq) of grain (or 1.00 oz eq of meat/meat alternate can be substituted for grain, after 1.00 oz eq of grain has been offered for the day).

Currently, students are able to select all food items offered on the breakfast line. The school nutrition professionals expressed that some students take all of the food items offered, but they believe this may be causing food waste. The menu planner has the ability to still offer all of the options, but limit the number of food items students are able to select from each component. However, students must have the ability to select the daily breakfast meal pattern requirements of 1.00 oz eq grain, 1 cup of fruit, and 8 fl oz of milk.

Breakfast signage is an excellent way to communicate to students what they are able to select as part of the reimbursable meal. Technical assistance was provided to the Food Service Director while on-site regarding breakfast meal pattern, breakfast OVS, and how to fill in OVS breakfast signage. Printable OVS breakfast signage can be found on the DPI SNT [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

#### *Fruit and Vegetable Signage*

Certain types of fruits and vegetables on the main line are selected using tongs. If a portioning utensil cannot be used to serve certain fruits and vegetables, such as mini peppers, signage can be utilized to let students know how many pieces, or mini peppers in this example, they can select to have the full planned portion size. Examples of this type of signage and printable signage can be found on DPI SNT's [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage under the Salad Bar Signage heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

### **3. RESOURCE MANAGEMENT**

#### **Nonprofit School Food Service Account**

Based on the Resource Management Questionnaire, the SFA triggered for a comprehensive review of the Nonprofit School Food Service Account. Documentation was provided to support the comprehensive review and everything matched.

#### **Paid Lunch Equity**

SFA submitted and completed the PLE tool for the 2018-2019 SY.

#### **Revenue from Nonprogram Foods**

SFA only sells extra milk and adult meals. All other food related programs operate outside of food service.

#### **Indirect Costs**

SFA was charging gas to the food service account. The kitchen was metered separately from the rest of the building.

### **4. GENERAL PROGRAM COMPLIANCE**

#### **Civil Rights**

SFA was following USDA civil rights regulations.

### **On-site Monitoring**

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.

### **Local Wellness Policy**

SFA had a local wellness policy on file that was being utilized.

### **Smart Snacks**

#### **Commendations:**

Butternut School District does an excellent job of tracking fundraisers their student organizations hold and complying with the exempt fundraiser parameters.

#### **Technical Assistance:**

##### *Fundraisers*

Butternut School District has their own local limitations on fundraisers that comply with requirements. If Butternut School District would like to allow fundraisers to take place during the school day, please take note of the Wisconsin exempt fundraisers rules.

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

The Smart Snacks standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (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.

### **Professional Standards**

Professional standards requirements were being met. SFA was logging training hours on a word document for each employee. The document listed the required hours needed, training received and duration of the training.

### **Water**

Water was available for breakfast and lunch.

### **Food Safety**

SFA was actively using the food safety plan and had the appropriate SOPs on file. Food safety inspections were on file.

## **Buy American**

### **Commendations:**

Butternut School District uses the WI DPI Buy American Non-Compliant Product List template for items with countries of origin that are not the USA. Excellent job!

### **Compliance Reminders:**

The USDA requires that a 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, to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

### **Technical Assistance:**

#### *Non-Compliant Products Found On-site*

The following products identified in Butternut School District's storage did not have proper labeling to identify the country of origin:

- Goldfish- Baked in the USA
- Assorted cereals- distributed General Mills
- Peanut butter- distributed Carriage House Companies, Inc.
- BBQ sauce- distributed Diamond Crystal Brands, Inc.
- Cinnamon- distributed Sysco
- Applesauce cups- distributed Indian Summer
- Canned peaches- packed in the USA
- Canned pizza sauce- packed in Ohio
- Canned green beans- distributed Burnette Foods, Inc.
- Muffins- distributed Artyza
- Mini pancakes- distributed General Mills
- Orchard Splash juice- distributed Leahy/IFP
- Cottage cheese- distributed Dean Foods
- Lettuce- distributed

In USDA Memo SP 38 -2017, any product that does not identify the country of origin requires certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products.

### *Achieving Buy American Compliance*

- 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 percent of its agricultural food component, by weight or volume, from the U.S.” This can be accepted in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (<https://dpi.wi.gov/school-nutrition/procurement/procurement-manual>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### **Reporting and Recordkeeping**

Records kept on file for 3 years plus the current.

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

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 Butternut School District USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months.

Resources:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)

## **5. OTHER FEDERAL PROGRAMS REVIEWS-NOT APPLICABLE TO SFA**



## Corrective Action Needed

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ **Finding #1:** Four students were issued incorrect benefits.

**Corrective Action Needed #1:** Send the households the [adverse action](#) letter. For a better benefit, change the benefit within 3 days. For a lesser benefit, change the benefit after 10 days. Send a copy of the letter sent to the households to the Nutrition Program Consultant by e-mail once completed.

❑ **Finding #2:** The software used by the SFA would auto-calculate the household eligibility status. The only income frequency in the software was monthly. The SFA had to annualize all income and then divide by 12 months in order to have a monthly income entered into the software so a benefit could be determined.

**Corrective Action Needed #2:** Discontinue the practice of converting all incomes reported on applications to monthly incomes for entry into software. Calculate incomes on applications based on the frequencies that were reported or annualized when multiple income frequencies are provided. Work with software company to include all of the income frequencies for application data entry or manually enter each frequency into software. Submit a statement on how the district will move forward when entering eligibility statuses into the software.

❑ **Finding #3:** SFA sent the public release to all households. The public release cannot be sent to households. It must be sent to a local news media, unemployment offices, and any major employers contemplating large layoffs in the attendance area of the school.

**Corrective Action Needed #3:** Submit a statement explaining where the public release will be sent to for the 2019-2020 school year and submit a statement of understanding that the public release cannot be sent to households in the district.

❑ **Finding #4:** Household letters for the notification of eligibility status did not include the required information. All letters should have information on how the household can deny benefits and the non-discrimination statement. For DC students, there should be a statement on how the household can add more students that were not listed.

**Corrective Action Needed #4:** There are two options: DPI has created a template with all of the required information for household notification letters that SFAs can use or the district choose to update the template to meet regulations. Please submit a statement on which option the district will use. If updating the district template, send a copy of the updated template to the Nutrition Program Consultant. DPI templates can be found on the [Free and Reduced Price Meal Applications and Eligibility](#) webpage, under Notification Letters

(<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>).

### **Findings and Corrective Action Needed: Verification**

❑ **Finding #5:** SFA had their own verification policy that did not contain the most current information. SFA are not required to have their own verification policy.

**Corrective Action Needed #5:** Submit a statement explaining how the SFA will handle the verification policy. It will either need to be eliminated or updated to reflect the most current regulations annually.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Findings and Corrective Action Needed for Meal Pattern and Nutritional Quality:**

❑ **Finding #1:** Breakfast and/or lunch production records did not have the following information filled in or were missing the following categories based on the [Production Record Requirements](#) (“Must Haves and Nice to Haves”)

(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>):

- Serving site
- Menu item with product name/description
- Planned/actual number of servings prepared
- Planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb case, 2-96 count case)
- Amount leftover for all items on production record
- Milk usage
- Planned serving size and usage for condiments and any extra menu items
- Number of reimbursable and non-reimbursable (adult) meals planned and served

While there is no required production record template, there are some examples that may be used on our [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

In addition, it is important to be specific on production records about the identity, brand, and description of the items served. Instead of “yogurt”, list all types/flavors of yogurt separately. “Yogurt” does not indicate exactly what was served. Fruit sizes (e.g. case count) should also be recorded.

**Corrective Action Needed:** Submit one week of completed production records for both breakfast and lunch with all of the production record “Must Haves” listed and filled in.

❑ **Finding #2:** Documentation provided for the week of review demonstrated a weekly meat/meat alternate (M/MA) shortage at lunch. Over the course of the week, only 7.50 oz eq

of M/MA were offered. The weekly M/MA requirement for the K-5 meal pattern is 8.00 oz eq M/MA.

The daily ham sandwich option contained the minimum amount of M/MA offered daily during the week of review. The ham sandwich credits as 1.50 oz eq M/MA because the three slices of ham on the sandwich credit as 1.00 oz eq M/MA and the slice of cheese credits as 0.50 oz eq M/MA.

**Corrective Action Needed:** Submit a written statement explaining how the K-5 weekly 8.00 oz eq M/MA requirement at lunch for the week of review will be met and your plan for ensuring the minimum M/MA requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

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

□ **Finding #3:** Documentation provided for the week of review demonstrated a daily and weekly fruit shortage at breakfast. On Wednesday, ½ cup of juice and one kiwi, crediting as ¾ cup, were offered to students. On this day, only ¾ cup of fruit was offered to students, resulting in a daily fruit shortage. The K-12 daily fruit requirement at breakfast is 1 cup.

Over the course of the week, 1 cup of fruit was offered on Monday, Tuesday, Thursday, and Friday. However, only ¾ cup of fruit was offered on Wednesday, resulting in a weekly fruit shortage because only 4.75 cups of fruit were offered. The K-12 weekly fruit requirement at breakfast is 5 cups.

**Corrective Action Needed:** Submit a written statement explaining how the K-12 daily and weekly fruit requirement at breakfast for the week of review will be met and your plan for ensuring the minimum fruit requirement is met for future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

***Additionally, fiscal action is required for any repeat daily and weekly fruit shortage violations from the previous Administrative Review. Therefore, fiscal action will be assessed. Per page 83 of the Administrative Review Manual, there will be a reclaim of meals with the insufficient fruit quantity. All 64 meals on Wednesday will be reclaimed due to an insufficient fruit quantity offered. The following repeat finding was documented from the School Year (SY) 2014-15 Administrative Review:***

- ***“The menu for the week of review was determined to not meet meal pattern requirements. The following shortages were found: a. Fruit was short Monday, Tuesday, Wednesday and Thursday at breakfast (only ½ cup offered).”***

***Please note, repeat violations of a daily and/or weekly fruit shortage during subsequent Administrative Reviews may result in fiscal action.***

□ **Finding #4:** Pre-K students are considered to be co-mingled for both breakfast and lunch by Butternut School District. Pre-K students are, in fact, co-mingled with the K-5 students at lunch, however, pre-K students are not considered co-mingled at K-12 breakfast.

Pre-K students are allowed to be served the NSLP and SBP meal patterns if they are served at the same time and in the same place as the other age/grade groups, under the USDA co-mingling flexibility. This flexibility may be used in situations in which it would be a challenge for school nutrition professionals to determine during meal service if a child is in pre-K or in K-5 at lunch or K-12 at breakfast, in Butternut School District's situation.

During on-site observation, pre-K students were served the K-12 meal pattern at breakfast, but they were not being served at the same time as the K-12 students. Children who are not yet in kindergarten must be served the updated Child and Adult Care Food Program (CACFP) meal pattern if not co-mingled with other age/grade groups at meals. Training and additional resources can be found 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>). The breakfast CACFP Child Meal Pattern for 3-5 year old students not yet in kindergarten can also be found on this webpage.

Because pre-K students are not co-mingled with K-12 students, the following were found as violations of the CACFP 3-5 year old meal pattern:

- OVS is implemented for the pre-K students. OVS is not allowable.
- Fat-free chocolate milk was offered to pre-K students. Only unflavored one percent or unflavored fat-free milk is allowable.
- There are sugar limits on cereals and yogurts.
  - Cereals must contain no more than six grams of sugar per dry ounce. The Cocoa Puffs 25% Less Sugar Bowlpak, Trix 25% Less Sugar Bowlpak, and Lucky Charms served during the week of review and the day of on-site observation exceed the sugar limit.
  - Yogurts must contain no more than 15 grams of sugar per four ounces. The yogurts offered during the week of review and day of on-site observation did not exceed the sugar limit.

Technical assistance was provided on-site regarding ways to implement the CACFP meal pattern for the pre-K students, how to assess the sugar limits, and that flavored milk and OVS are not allowable.

**Corrective Action Needed:** Submit a written statement detailing Butternut School District's action plan for the pre-K students to be in compliance with USDA requirements.

❑ **Finding #5:** The school nutrition professionals were unclear about the OVS requirements for lunch demonstrated by signage posted on the service line, lack of OVS training for several years, and discussion with school nutrition professionals.

Signage posted for lunch said, "Grades K-8 must take: ½ cup fruit, ¾ cup vegetable, OR combination of." This is not accurate. Under OVS, students are required to select three full components, one of which is ½ cup fruit, vegetable, or combination. It is required that K-8 students be offered ½ cup fruit and ¾ cup vegetables, per the K-5, 6-8, and K-8 daily meal pattern requirements at lunch.

Signage posted for breakfast said, “Grades K-12 must take: 3 items, 1 of the items must be 1 cup of fruit OR ½ cup of fruit & ½ cup of juice.” This is not accurate. Under OVS, students are required to select three food items, one of which is ½ cup fruit, vegetable, or combination. It is required that K-12 students be offered 1 cup of fruit (vegetable can be substituted for fruit), per the K-12 daily meal pattern requirements at breakfast.

The school nutrition professionals were also under the impression that students must select an entrée for the meal to be reimbursable. However, this is not accurate, as a K-8 student may select 1 cup milk, ½ cup of fruit, ½ cup of vegetable, and the meal is considered reimbursable. This meal is considered reimbursable because two full components (1 cup milk and ½ cup fruit) and ½ cup vegetable were selected. Therefore, three full components, one of which is ½ cup fruit, vegetable, or combination were selected. This is similar for breakfast. A student can select 1 cup milk, ½ cup of fruit, and ½ cup of juice because three food items are selected, one of which is ½ cup of fruit.

Technical assistance was provided on-site but additional OVS training is required to ensure all meals claimed for reimbursement are reimbursable and that students are not required to select more than what is required for a reimbursable meal.

The [Offer Versus Serve Guidance Manual](#) and [Offer Versus Serve webcasts](#) (Offer versus Serve and Offer versus Serve - Meal or No Meal Lesson and Game) can be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).

**Corrective Action Needed:** Submit a brief explanation on how OVS training plans to be conducted for school nutrition professionals and point of service staff. Submit a signed training roster after training has been completed.

❑ **Finding #6:** While signage was present for breakfast and lunch, the signage did not include the required statement that ½ cup fruit, vegetable, or combination must be selected under OVS. Please add a statement to your current signage that states students must select at least ½ cup fruit, vegetable, or combination.

If you are interested in ordering free signage, please visit the [Team Nutrition](#) webpage ([dpi.wi.gov/team-nutrition](http://dpi.wi.gov/team-nutrition)) and complete the Resource Order Form. Examples of signage can be found and printed from our [Signage Resources](#) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

**Corrective Action Required:** Submit a picture of new or supplemental signage that has been posted. Discard inaccurate signage posted on the service line mentioned in **Finding #5**.

### 3. RESOURCE MANAGEMENT (NO FINDINGS)

### 4. GENERAL PROGRAM COMPLIANCE

#### Findings and Corrective Action Needed: On-site Monitoring

❑ **Finding #1:** SFA stated that on-site monitoring was completed for the 2018-2019 school year. Documentation was unavailable on site.

**Corrective Action Needed #1:** Submit the on-site monitoring forms to the Nutrition Program Consultant for the 2018-2019 school year.

### **Findings and Corrective Action Needed: Local Wellness Policy**

❑ **Finding #2:** Some of the required information was included but not all. Information regarding the triennial assessment, nutrition promotion, smarter lunchrooms and verbiage about the vending machine should be included.

**Corrective Action Needed #2:** Submit a timeline for when the district will update the wellness policy.

### **Finding and Corrective Action Needed for Smart Snacks:**

❑ **Finding #3:** The following products in the vending machines are non-compliant based on the Smart Snacks standards for beverages for the youngest students who have access:

- Propel (all flavors), 20 fl oz – No-calorie beverages are not allowable for elementary and middle school students.
- Vita Ice (all flavors), 17 fl oz – No-calorie beverages are not allowable for elementary and middle school students.
- 100% fruit juice (all flavors), 15.2 fl oz- 100% fruit juice must be 8 fl oz or less in order to be compliant for the youngest student who have access. 100% juice can be 12 fl oz or less if only middle school and/or high school students have access.

Beverages in the vending machines must meet the Smart Snacks standards for the youngest age/grade group present, elementary students in Butternut School District's case. If vending machines do not meet the Smart Snacks standards for the youngest students, they must be shut off during the school day.

Prior to the on-site visit, the Superintendent explained that there are two beverage vending machines that are off 7:30 am-3:30 pm. The instructional day ends at 3:30 pm. Technical assistance was provided prior to the on-site visit about the Smart Snacks definition of the school day, midnight until 30 minutes after the instructional day.

Prior to coming on-site and while on-site, the vending machines were off 7:30 am-4:00 pm. Unfortunately, this is still out of compliance because the vending machines must be turned off from 12:00 am-4:00 pm because there are non-compliant products in both machines.

**Corrective Action Needed #3:** Submit a written statement detailing Butternut School District's action plan for bringing the vending machines into compliance.

## Findings and Corrective Action Needed: Food Safety

❑ **Finding #4:** Employee Reporting Agreements were not on file.

**Corrective Action Needed #4:** Have each food service employee review, sign and date the [Food Employee Reporting Agreement](#). Submit copies of completed agreements as an attachment to assigned DPI Nutrition Program Consultant via email.

## Findings and Corrective Action Needed: SFSP and SBP Outreach

❑ **Finding #5:** SFA was not promoting the Summer Food Service Program.

**Corrective Action Needed #5:** Submit a statement on how Butternut School District will promote the Summer Food Service Program

## 5. OTHER FEDERAL PROGRAMS REVIEWS-(NOT APPLICABLE TO SFA)

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>).

