

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

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**School Food Authority:** Crandon School District

**Agency Code:** 211218

**Review Date(s):** May 8-9, 2018

**School(s) Reviewed:** Crandon High School

**Date of Exit Conference:** May 9, 2018

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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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage ([dpi.wi.gov/school-nutrition/training](http://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](http://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 Crandon School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide 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 DPI review team is confident that Crandon School District will continue to improve their knowledge and operation of USDA School Meals Programs.

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## **REVIEW AREAS**

### **COMMUNITY ELIGIBILITY PROVISION (CEP)**

#### **Commendations:**

The SFA retained all appropriate CEP documentation onsite. This included information to support the SFAs Identified Student Percentage (ISP), yearly intent forms, and all communications with DPI SNT. Households are correctly informed before the beginning of the school year notifying them that the SFA is CEP and free meals are provided to all students for that school year. Additionally, the claiming percentage matched the SFAs online contract and monthly claims. Really great work!

#### **Technical Assistance:**

- During school year 17-18, the SFA is in its cycle year four for CEP. Therefore, if the SFA wishes to continue as a CEP school, the [CEP Application \(PI-6304\)](https://dpi.wi.gov/sites/default/files/imce/forms/xls/f6304.xlsx) must be completed. This application may be submitted anytime between May 1 and June 30, 2018 (<https://dpi.wi.gov/sites/default/files/imce/forms/xls/f6304.xlsx>).

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

### **Benefit Issuance**

#### **Technical Assistance:**

- For a district-wide CEP school, Direct Certification (DC) must be run during the month of October, and then on or before April 1. The SFA did not have an October DC run. If the SFA continues as a district-wide CEP school, please keep these requirements in mind. For more information on CEP DC requirements, reference the [CEP Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf>).

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### **Counting and Claiming**

#### **Commendations:**

Counting and claiming issues were not observed onsite for the day of review nor the review period.

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## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Sincere thanks to the Food Service Director and school nutrition professionals of Crandon School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. All school nutrition staff were welcoming and professional. They had pleasant interactions with students during observed meal services. Kitchens and service areas were very clean as well. The Food Service Director was available to answer questions and receptive to feedback. The Food Service Director is highly organized, preparing well balanced, and healthy meals for students. Unlike most schools operating the NSLP, many popular menu items are made from scratch by the kitchen staff, including fresh baked bread, buns, rolls, and many popular menu items. Crandon School District is a HUSSC award winning school with a food service director that has been awarded a G.O.A.L. Certificate. It is apparent that Crandon School district is dedicated to the health and well-being of their students.

### Comments/Technical Assistance/Compliance Reminders

#### New information -

- State Superintendent Evers recently shot a short video highlighting the importance of healthy eating, physical activity, and overall school [wellness](https://dpi.wi.gov/wisconsin-school-meals-rock/videos) (https://dpi.wi.gov/wisconsin-school-meals-rock/videos).
- Also, DPI School Meals Rock has just launched a [new toolkit](https://dpi.wi.gov/wisconsin-school-meals-rock/school-nutrition-professionals/school-nutrition-outreach-toolkit) to assist schools to promote their food and nutrition programs to parents, educators, and administrators. (https://dpi.wi.gov/wisconsin-school-meals-rock/school-nutrition-professionals/school-nutrition-outreach-toolkit)
- Information on this summer's SNSDC trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up).
- The U.S. Department of Agriculture encourages schools to utilize [Smarter Lunchroom Techniques](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp_ch6.pdf) to encourage students to make healthy food choices (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp\_ch6.pdf).
- [Smarter Lunchrooms Strategies](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies) use research-based principles that lead children to make healthy choices but still offer a full spectrum of choice (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies).
- All Smarter Lunchroom techniques are low- or no-cost, sustainable, and focus on improving the lunchroom environment to promote healthful eating behaviors.

#### Production Records

- Be specific on production records about the identity, brand, and description of the items served. Production records should indicate exactly what was offered as part of a reimbursable meal. Fruit sizes (e.g. case count) and by type (e.g. canned, frozen) should also be recorded.
- DPI website has a list of [must have's and nice to have](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).
- Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

- 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.
- There is also an [Instructions for How to Fill out Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).
- Technical Assistance was provided onsite for ways to update the current production record with the required elements.

#### Grains

- The USDA meal pattern for 9-12 grade students requires them to be offered 2 oz eq of whole grain daily.
- All of the freshly baked bread products on site credit for more than their store bought counter parts. Good Job!
- On Monday (03.12.18) and Friday (03.16.18) the student who chose the Chef Salad Entrée option were not offered 2 oz eq whole grain with this choice.
- Technical Assistance was given onsite. Multiple options were discussed with the FSD.

#### Fruit

- Under USDA NSLP meal pattern, it is requires that 9-12 grade students be offered 1 cup of fruit daily.
- On Wednesday (03.14.18) of the review week, students were offered a small Clementine/Cutie Orange. According to the Food Buying Guide one of these oranges credits as 3/8<sup>th</sup> of a cup.
- If a student were to only choose this item to fulfill the ½ cup requirement, they would be short 1/8<sup>th</sup> cup.
- Technical Assistance was given onsite to the FSD.

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

#### Standardized Recipes

- Standardized recipes are required for all menu items that have more than one ingredient (e.g., ham and cheese sandwich, mashed potatoes). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes.
- A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation.
- Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

- The three fresh bread recipes are standardized to your kitchen, using existing equipment, and current ingredients. Making fresh bread for your students is unique and very special. Keep up the good work!

Findings and Corrective Action Needed: Meal Pattern

**Finding #1:** Old and missing standardized recipes

**Corrective Action Needed:**

Re-standardize and update the Chili recipe

Create a Ham and Cheese Sandwich recipe

### 3. RESOURCE MANAGEMENT:

**Commendations:**

Indirect and unallowable costs were not observed during the onsite review. The Annual Financial Report (AFR) in previous school years had all expenditures and revenues appropriately categorized.

**Compliance Reminders:**

Non-Program Foods

- Non-program foods include: Adult Meals, A la Carte items, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines. If the SFA sells food items beyond adults meals and extra milks in the future, the [Non-Program Foods Revenue Tool](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) is required to be completed annually (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).
- All non-program food costs, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals nor may they have a non-program foods loss absorbed by the food service account. Thus, non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

Indirect and Unallowable Costs

- **Indirect costs** are incurred for the benefit of multiple programs, functions, or other cost objectives and therefore cannot be identified readily and specifically with a particular program. Indirect costs typically support administrative overhead functions such as fringe benefits, accounting, payroll, purchasing, facilities management, utilities, etc.
- **Allowable costs** assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools.
- Any costs assessed to the foodservice account must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the

indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.

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#### 4. GENERAL PROGRAM COMPLIANCE

##### On-site Monitoring

**Commendations:**

Required on-site monitoring forms were completed for all NSLP sites and at least half of the SBP sites.

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##### Local Wellness Policy

**Commendations:**

The SFA implements a very specific and expansive Local Wellness Policy (LWP) that includes all required components. All staff work together to promote a healthy and positive school environment in the cafeteria. Wonderful job!

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##### Reporting and Recordkeeping

**Commendations:**

All records were retained onsite for the minimum three years plus the current school year. Thank you!

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

**Commendations:**

The SFA completed the required outreach at the beginning of the school year for SBP and the required outreach at the end of the school year for SFSP. The SFA offers free meals in the summer months and notifies households and surrounding schools of this offering. Great work!

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##### Smart Snacks

**Commendations:**

The foodservice director does a great job organizing and staying on top of the Smart Snacks requirements and regulations. All food items served in vending machines were successfully run through the Smart Snacks calculator.

**Compliance Reminders:**

- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie ( $\leq 5$  kcal/fluid oz.) flat or

carbonated, or no-calorie beverages (<5 kcal/8 fluid oz; ≤10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable.

- All compliant products should have documentation on file at the SFA supporting their compliance after being run through the calculator.
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### Professional Standards

#### **Commendations:**

The Professional Standards tracking tool utilized by the SFA contains all required elements, and all nutrition staff have either met or are on their way to meeting all annual training requirements. **In 2017, the food service director obtained her GOALS Certificate of Excellence signed by the WI state superintendent of schools. Fantastic work!**

#### **Technical Assistance:**

- If the SFA chooses, it may utilize excel to auto-calculate total training hours completed by each nutrition staff member. However, this is not required by the SFA. Trackers are required to include the following information: employee's name, date of hire, full-time or part-time, and his or her position.

#### **Resources:**

- [DPI's Excel-based Professional Standards tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx)  
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>)
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### Civil Rights

#### **Commendations:**

The Civil Rights Self-Compliance Evaluation (PI-1441) form was completed by the October 31 due date and the "And Justice For All" poster was posted in a publicly visible location. The foodservice director has also taken the time to create a Special Dietary Needs document for each student. These are used to communicate each student's specific needs to foodservice staff during service. Thank you!

#### **Technical Assistance:**

- The review team would like to make note that, per new regulations within the [Permanent Agreement](#), when a complaint is submitted to the SFA, the SFA has five days to report the complaint to USDA (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/permanent-agreement.pdf>).

#### **Compliance Reminders:**

- All documents and resources containing information regarding the NSLP or SBP that are sent to households, put on the SFA's website, and/or sent out to the public **must** contain the non-discrimination statement.

#### 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. You may use [DPI's prototype Medical Statement for Special Dietary Needs](#) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Findings and Corrective Action Needed: Civil Rights

❑ **Finding #2:** The non-discrimination statement on the breakfast and lunch menus, public release, and local wellness policy (LWP) is incorrect.

**Corrective Action Needed:** The menus and public release were correct onsite; no further action required. Please include the correct statement on the LWP and send it to the consultant assigned to your review.

❑ **Finding #3:** The business manager did not complete the annual civil rights training. All nutrition and non-nutrition employees with job duties related to the school meals programs are required to complete the civil rights training annually.

**Corrective Action Needed:** Please submit the civil rights sign-off sheet to the consultant assigned to your review.

**Resources:**

- [CEP Public Release template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-public-release.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-public-release.doc)
- [Full Non-Discrimination Statement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc)
- When space is limited, the shortened statement may be used: **This institution is an equal opportunity provider.**

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**Food Safety and Storage**

**Commendations:**

The SFA's food safety plan contained all required components, the most recent food safety inspection was posted in a publicly visible area, and no storage violations were observed. Thank you!

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**Buy American**

**Compliance Reminders:**

- The USDA requires SFAs purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, farmers, and provides healthy choices for children in the USDA School Meals Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- 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.

Findings and Corrective Action Needed: Buy American

❑ **Finding #4:** The SFA purchases frozen broccoli that is a product of Mexico.

**Corrective Action Needed:** Please submit a completed non-compliant form for this product or notify the review team of a US product for which you choose to serve instead.

**Resources:**

- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the [SNT Procurement webpage](http://dpi.wi.gov/school-nutrition/procurement/buy-american) (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

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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](http://dpi.wi.gov/statesupt/agenda-2017) webpage ([dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017)).



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