

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

School Food Authority: Fennimore School District

Agency Code: 221813

School(s) Reviewed: Fennimore Elementary School

Review Date(s): May 7, 8, 2019

Date of Exit Conference: May 8, 2019

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, 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 Fennimore 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. Everyone was 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

21 Paper Applications were reviewed, and no Benefit Issuance errors were found. Direct Certification runs were also reviewed. A DC run is being done twice a month.

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.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value.

However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

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 the application to be considered complete.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

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.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- 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.
- 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. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

Commendations/Comments/Technical Assistance/Compliance Reminders

Technical Assistance was provided in regards to annualizing the income on an application or not. Also discussed was making notes on the actual application if a phone call was made to follow up or obtain more information before determining the application.

Findings and Corrective Action Needed: Certification and Benefit Issuance

There are no errors in Benefit Issuance. Nothing further needed.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Verification

There were no errors in the Verification process, and the report was submitted on time.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- The meal counting and claim for the Review Month was conducted perfectly.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- **Finding:** It was observed during Breakfast Service on 5/8/19, that a teacher aide brought a student's ID card to the POS person to be scanned and to take the breakfast meal back to the classroom for the student. The student is part of the Special Education class. When the aide was asked if the student was in the school, the answer was "no", she isn't present yet. So the issue is a student was going to be charged for a meal when she was not even present in the bldg. at that time. This is unallowable. It was explained that the student needs to be present and to make her own choices of a meal if she is able. IF she is not able, then the SFA would need a Special Dietary note from the doctor explaining the situation. Only then can a teacher or teacher aide go to the cafeteria, pick up the meal get the card scanned at POS, and return to classroom with the meal. If the student did not come to school this day, then this would be a "backing out" type situation where the charge would be removed later. This also is unallowable. The SFA waited until the student arrived and came to the cafeteria to select her own breakfast.

Corrective Action Needed: We received a message from the Administrator that the mother had called the school, said they were going to be late, could someone go to the cafeteria to get a breakfast for her daughter who is special needs and have it in the classroom for her when she gets there. Her concern was that the breakfast service was closing before they arrive. Nothing further is needed. Technical assistance was provided if needed for this situation. Nothing further needed.

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).

When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the

deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- 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, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf): (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>)
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin [Department of Revenue](#) (DOR) as unclaimed property. The DOR has rules concerning unclaimed property that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).
- **❑ Finding:** In observing lunch service on 5/7/19, it was observed that the POS system still shows all prices being charged students on the screen. The POS computer is located on the counter. The director is operating it from behind the counter. The computer faces into the kitchen directed at her only. The students cannot see the screen nor can her staff. In observing breakfast service on 5/8/19, the staff person that does POS for breakfast stands on the outside of the counter where the computer is located. Currently the screen faces the students, however she uses a scanner for students id cards that charges for meals, same as at lunch service. No price amount or balances show up on the screen due to the staff member who operates the computer at breakfast does not have rights to that part of the program. So it is fine that the computer is facing outwards. The students only see their picture, nothing else. It is charged on the backside when their id card is scanned.

Corrective Action Needed: In conversation with the DPI office while on review, we were advised that for Lunch service, if no one else could see the screen but the director who was scanning students, it would be OK. For Breakfast Service, the scanner to charge students id cards is on a long cord and the computer faces outward towards student. However, students only see their own picture, no balances or charges. As explained above, this process is fine as well. Nothing further needed.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

2. MEAL PATTERN AND NUTRITIONAL QUALITY

❑ Finding: You must record daily usage by milk type on your production records (e.g., skim chocolate milk, 1 percent white milk). If it becomes too time- or labor-intensive to record milk usage by type on production records, you may consider using a Milk Recipe (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc>). A milk recipe is documentation of average milk usage by meal (breakfast or lunch) and grade group. When a milk recipe is on file, total milk usage must still be recorded on production records. Milk recipes must be updated twice per year or when you notice that students’ preferences have changed.

Corrective Action Needed: Submit either 1 week of breakfast and lunch production records with milk use recorded by type or submit a milk recipe for breakfast and for lunch.

❑ Finding: There is no overlap in calorie requirements for students in grades 6-8 and those in grades 9-12. This means grades 6-12 cannot follow the same meal pattern as grades 9-12. Grades 6-8 can follow the 6-8 meal pattern, or they can be included with the grades K-6 under the K-8 meal pattern. During the second meal service grade 9 comes through the lunch line, followed by grade 8. This allows time to make different size spoodles available when needed.

Corrective Action Needed: Submit a statement explaining how a separate 6-8 and 9-12 meal pattern will be followed going forward.

□ **Finding:** Please use our [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage to aid in completing standardized recipes (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). There is a [Standardized Recipe Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf) to include all parts of a standardized recipe, calculators to assist with nutrient analysis, and a template to organize the information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf).

Updated standardized recipes are needed for:

- Walking taco (template emailed for FSD)
- Pasta salad (also note, because ingredients other than fresh vegetables are in the USDA pasta salad recipe, a portion cannot credit purely as vegetables. In fact, this is a predominately grain based dish. Please update standardized recipes and production records to reflect this.)
- Canned fruit daily (The canned fruit daily recipe need to indicate how many cans or cases of each fruit to use daily. Alternatively, instruct staff to record each fruit offered daily on individual lines on production records (recommended by SA).)
- Assorted fruit bowl or tray (The assorted fruit bowl or tray recipe needs more detailed information:
 - Indicate case count for apples (some apples credit more than ½ cup)
 - Indicate case count for oranges
 - If “mandarin oranges” refers to clementines, please note that each = 3/8 cup
 - Indicate how grapes are portioned into ½ cup
 - “Pears, mandarin oranges, grapes, or pick one available daily” is not specific enough- have staff record the specific fruit on the production record or create a more specific standardized recipe
- Alternatively, instruct staff to record each fruit offered daily on individual lines on production records.)
- Assorted vegetable bar (The assorted vegetable bar recipe does not yield the projected number of ½ cup portions. It could be recorded in a more streamlined and detailed fashion. Consider posting the weekly chart and vegetable subgroup table. Instruct staff to record each vegetable offered daily on individual lines on production records (recommended by State Agency [SA]).)
- Deluxe refried bean dip (Because ingredients other than refried beans are in the deluxe refried bean dip recipe, a ¼ cup portion cannot credit purely as ¼ cup beans. Please update standardized recipes and production records to reflect this.)
- Beans and rice (Because ingredients other than red beans are in the rice and beans recipe, a ½ cup portion cannot credit purely as ½ cup beans. In fact, this is a predominately grain based dish. Please update standardized recipes and production records to reflect this.)
- Side salad (update portion size)
- Whole wheat French garlic bread (even though USDA refers to these as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they have been tried, tested, and adapted to your food service operation.)
- Whole wheat rolls, breadsticks, and buns (even though USDA refers to these as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they have been tried, tested, and adapted to your food service operation.)

Corrective Action Needed: Please submit the requested standardized recipes

□ **Finding:** Bean/peas (legumes) shortage at lunch. Students must have access to at least ½ cup of beans/peas (legumes). During the week of review, only 1/8 cup beans were offered in the form of rice and beans. Daily M/MA shortage (taco) lunch. The portion of taco meat and cheese offered to HS students is 1.75 oz eq. High school students must have access to 2 oz eq M/MA at lunch daily. Weekly grain shortage at breakfast. K-12 students must be offered at least 9 oz eq grain. During the week of

review students only have access to 8 oz eq grain. This may be due to the 1 oz eq muffin (Friday) and cinnamon roll (Tuesday) offered.

Corrective Action Needed: Outline what will be done to this week of the cycle menu to ensure that students are offered ½ cup of b/p (l) weekly. Submit updated standardized recipe for taco/meat. Outline what will be done to this week of the cycle menu to ensure that students are offered 9 oz eq grain weekly.

❑ **Finding:** Students must be offered 1 cup fruit at breakfast. Using offer versus serve students are required to take ½ cup of fruit at breakfast. ½ cup fruit counts as 1 item. The breakfast signage must list the three components and the four items offered, and must communicate to students that under Offer versus Serve (OVS), they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination

Corrective Action Needed: Please update all breakfast signage and submit a photo of the signage posted.

❑ **Finding:** Under OVS for the breakfast meal pattern, four food items must be offered from the three components (grain [and optional m/ma], fruit/vegetable, and milk). An item is defined as 8 fluid ounces of milk; ½ cup of fruit and/or vegetable; and 1 oz eq of grain (and optional m/ma). Visit <https://dpi.wi.gov/school-nutrition/school-breakfast-program/menu-planning> for additional guidance. See <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf> and <https://dpi.wi.gov/school-nutrition/training/webcasts> for training resources.

Corrective Action Needed: Have staff responsible for determining reimbursable meals attend a training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.

❑ **Finding:** Offering second servings complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly averages. If students are still hungry, second servings may be sold a la carte.

Corrective Action Needed: Discontinue the practice of offering second servings free of charge to students. Submit a signed statement of understanding (FSD and admin)

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Paid Lunch Equity

Fennimore was not required to raise prices this year, due to a positive balance in Fund 50 as of Jan. 31, 2019. They did complete the PLE Survey. No further action needed.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Revenue From Nonprogram Foods

❑ Finding: On the Annual Financial Report, it was noted that there is nothing entered for Non-Program Foods in the “expenditure” column. Since the school is selling separate milks, and adult meals, these are considered Non Program Foods. If the school chooses to sell 2nd entrees, this will also be part of that.

Corrective Action Needed: When completing the annual Annual Financial Report, be sure to add the Non Program Foods (adult meals and milks), and also include labor. Submit a signed statement as part of corrective action that this will be done for the current school year’s Annual Financial Report in June of 2019.

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

There are no indirect costs at this time.

3. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Civil Rights Training is being done each year at Fennimore School District. Documentation is being retained as required.

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

On-Site Monitoring was forgotten, but when documentation was received prior to the scheduled AR, the SFA realized it and completed it immediately. Documentation was available for us to review while we were on site. Nothing further needed.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements 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 each school complies with the policy.

Findings and Corrective Action Needed: Local Wellness Policy

The Fennimore School District Wellness Policy looks great! TA was given to add the language “community members and /or parents” to the policy under the paragraph title of Policy Leadership. Continue to update the policy as needed and review as required. Keep copies of minutes and attendance roster of meetings. Nothing further is needed.

Professional Standards

Professional Standards: Training Requirements

- 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.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- 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, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- **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.

Commendations/Comments/Technical Assistance/Compliance Reminders

The Food Services Director has Professional Standards Training as required. It is documented on the DPI tracker for training. Also her staff, and the administrative assistant who does the Food Service Reporting. All training is documented and up to date. Many have attended our SNSDC summer classes. Keep up the good work!

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Findings and Corrective Action Needed: Water

Water is available to students at no charge. Nothing further needed.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.
- 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.

Findings and Corrective Action Needed: Food Safety and Buy American

❑ Finding: The following non-domestic products were found in storage without sufficient documentation:

- Tropical fruit salad
- Pineapple

Corrective Action Needed: Please submit a copy of completed [non-domestic documentation](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) for products, as well as any other products found in inventory (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

❑ Finding: The current Food Safety Inspection was posted inside the Kitchen. TA was given to place the report out in the cafeteria where public can view it. The second inspection has not occurred as of this AR date. The SFA placed a call to the sanitarian since their school year ends May 30, 2019. He said he planned to get there before the end of May.

Corrective Action Needed: The report was posted out in the cafeteria the same day. This corrected on site, nothing further is needed.

Sharing and No Thank You Tables

Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.

Sharing Table

A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

❑ Finding: A sharing "tub" is used at breakfast only in the high school. It is monitored by a teacher aide. We noticed that another teacher came up and filled a tray with mostly fresh fruit and juice cups to take to her classroom for students to eat as they were hungry during the school day. There was some discussion with the PHN, NPC and Food Service Director. The SFA told us the district is responsible for this. In talking with the district administrator, she confirmed it. I also mentioned there needs to be an SOP (standard Procedure) for this process. I emailed a template and several examples of SOP's to the administrator. Finally, we observed large amounts of food going into the Sharing tub at Breakfast service. It was realized that the students were not clear in what they were offered, and what exactly needed to be taken. The signage was a bit confusing. This allowed a lot of food to be put into the sharing tub. The PHN section of this report will correct this.

Amendment to this finding: After much discussion with the administrator, we realized how important this sharing tub is to the special needs students. Some of the students family/home life is not very good, and the food they receive here at school is crucial. The administrator explained that some of the situations for students are dire. So all we are asking for is an SOP for this procedure.

2nd Amendment to this finding: As of 5/28/19, before the final closing of this review, I received an email from Fennimore district administrator, that the practice of using a “Sharing Tub” has ended. It will not be utilized next school year. No CA will be needed for this finding.

Cancelled/Corrective Action Needed: Submit a SOP (standard operating procedure) to the consultant by the Corrective Action due date on this report. Keep a copy on file per the record retention rule as well.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Reporting and Recordkeeping

All records from Food Service are being kept for the required 3 years plus the current year. Nice job!

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

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: SFSP and SBP Outreach

❑ **Finding:** Fennimore School District administrative assistant was not aware of having to notify families where to get summer meals. TA was given, and the consultant helped with showing the map on the DPI website to find where meals are being served this summer. The administrative assistant contacted another near by school to compare what they were doing. A reminder was also given to do this annually as well.

Corrective Action Needed: Fennimore School District has printed up an informational sheet and posted it outside all school offices to let families know about Summer Meal locations. Corrected on site, nothing further needed.

4. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Fennimore School District participates in the Wisconsin School Day Milk Program.

Commendations/Comments/Technical Assistance/Compliance Reminders

The POS (point of Service) for the milk program is correct. Students are charged as they take their milk. A food service staff person is monitoring this and does the POS. Great job!

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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/state_supt/every-child-graduate) webpage (https://dpi.wi.gov/state_supt/every-child-graduate)."

