

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

School Food Authority: Juda School District

Agency Code: 23-2737

School(s) Reviewed: Juda Elementary School

Review Date(s): 3/19/18-3/20/18

Date of Exit Conference: 3/20/18

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Juda 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

136 eligibility determinations were reviewed, 2 errors were identified.

Free and Reduced Price Meal Applications

- 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](#) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- 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. The purpose is to inform the public that free and reduced price meals and free milk 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.

Direct Certification

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.

Transferring Students

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. However, note that Wisconsin DPI requires source documentation of the student's previous eligibility.

The transfer of eligibility *between LEAs* for students attending Community Eligibility Provision schools will be required by July 1, 2019.

Independent Review of Applications

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

Juda School District had a 1.47% certification error rate and will *not* be required to conduct a second review of applications.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding #1:** Two students (A & B) were incorrectly approved for meal benefits as noted on the SFA-1 form. The number of child and adult household members listed on the application did not match the number reported in box 3G, making the application incomplete.

Corrective Action Needed: Follow-up with the households and obtain the missing household names and any reportable income they may be receiving. Sign/date, and initial the communication on the application. Re-determine the application and notify the household of any changes (increase, or decrease in meal benefits).

Completed onsite. No further action required.

- ✓ **Finding #2:** The direct certification notification letter is missing the following required verbiage:
 - language that states that the eligibility of free meal benefits extends to all school-aged children in the household;
 - language informing the household of how to notify the LEA of any additional school-aged children in the household not listed on the notification;
 - language explaining how the household can notify the LEA if the household does not wish to receive free benefits for directly certified children.

Corrective Action Needed: Update the Skyward letter templates to cover the required information. Consider using the DPI DC and application approval/denial templates, which are updated annually with the release of the Free and Reduced Meal application.

Corrected onsite. No further action required.

- **Finding #3:** The 1718 SY Public Release was not distributed to grassroots organizations in addition to the local media.

Corrective Action Needed: Submit a statement outlining where the release will be sent in the 18-19 SY.

Verification

Commendations/Comments/Technical Assistance (TA)/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.
- 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.
- DPI- SNT has [Verification Tracking forms](#) available on our website to assist in documenting the process.
- The number of school sites are reported incorrectly on the 17-18 SY Verification Collection Report (VCR). Juda SD has two DPI recognized school sites (K4-8) and (9-12). This can no longer be corrected as WI VCRs have already been reported to USDA. Ensure this is completed correctly in future years.

Findings and Corrective Action Needed: Verification

- Finding #1:** The confirmation review was not completed.

Corrective Action Needed: Review pages 103-104 in the 17-18 SY [Eligibility Manual \(EM\) for School Meals](#). Submit a statement agreeing to conduct the confirmation review in future years. Also include the date the confirming official reviewed the aforementioned EM guidance.

- Finding #2:** Verification was completed after November 15th.

Corrective Action Needed: Submit a timeline outlining when verification activities will begin for the 18-19 SY to ensure completion by the required deadline.

Meal Counting and Claiming

Findings and Corrective Action Needed: Meal Counting and Claiming

- ✓ **Finding #1:** An underclaim was found at the Elementary School for the NSLP. The agency omitted lunches served on the accuclaim for a student they thought was ineligible. After review, the student is enrolled with access to the NSLP, therefore, the agency is eligible to claim those lunches. Because this was found on review, the agency can go back and amend claims November, 2017-February, 2018.

Corrective Action Needed: Submit a claim adjustment for the additional lunches at the Elementary school for the months of November-February 2018.

Corrected onsite. No further action required.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of Juda School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. All school nutrition professionals were receptive to feedback, both positive and constructive criticism.

They asked questions reflective of their desires to learn and to improve all Child Nutrition Programs. The kitchen was tidy and efficient through receiving and meal service. Teamwork amongst the school nutrition professionals was remarkable.

Technical Assistance and Program Requirement Reminders

Non-reimbursable Meals

One student at Juda Elementary School selected a non-reimbursable meal during lunch meal observation on March 19. The student's meal contained one cup of iceberg lettuce, 3/8 cup of green beans, four ounces of yogurt, and five orange wedges. Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.

School Breakfast Program

The breakfast meal pattern requires at least 1 cup of fruit to be offered daily at breakfast. As a reminder, no more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. The current offering of ½ cup of fruit daily does not meet the daily (1 cup) and weekly (5 cups) minimum requirements for the fruit component.

Breakfast signage was filled in with the daily menu. However, breakfast signage did not specify the number of food items that each menu item was planned as nor the number of items from each component that students could select.

An item at breakfast is defined as 1.0 ounce equivalent (oz eq) grain, 1.0 oz eq m/ma, 1/2 cup of fruit and/or vegetable, or 1 cup of milk. Under Offer Versus Serve (OVS), four food items must be offered at breakfast, and students must select at least three food items, including 1/2 cup fruit, vegetable, or combination, to have a reimbursable meal.

Breakfast bars (Hormel Breakfast Combos Ham, Egg, and Cheese Bar) offered on the breakfast menu credit as less than 1.0 oz eq of grain. Breakfast bars must be bundled with other items so at least 1.0 oz eq of grain is offered each day to meet the daily minimum requirement for grain, and so these items can be counted as an item for the breakfast meal pattern.

The menu planner must determine in advance whether grain and/or m/ma items crediting as 2.0 oz eq count as one or two food items. He or she must clearly communicate to students what foods to select in order to have three food items for a reimbursable breakfast. For example, the pancake wraps served during breakfast meal observation on March 20 credited as 2.0 oz eq; they may be counted as either one or two food items.

Food Buying Guide

The [USDA Food Buying Guide for School Meal Programs](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods), including whole fruits like oranges, apples, bananas, and kiwis. Foods that do not have standards of identity are not listed in the Food Buying Guide and require further documentation (a CN label or a PFS) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs. Refer to the Food Buying Guide for more details on how specific foods and ingredients credit toward the meal pattern (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>). The [Food Buying Guide Mobile App](https://www.fns.usda.gov/tn/food-buying-guide-mobile-app) provides quick access to food yield information to help you make quick purchasing decisions from your mobile device (<https://www.fns.usda.gov/tn/food-buying-guide-mobile-app>).

Crediting Documentation

A Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the [USDA Food Buying Guide for Child Nutrition Programs](https://foodbuyingguide.fns.usda.gov) (<https://foodbuyingguide.fns.usda.gov>). 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 include these four things. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label. More information is available on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

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 Child Nutrition Programs. Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

Production Records

Planned portion sizes are required for every meal component and condiments. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Please refer to the [Production Record Requirement list](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

The breakfast and lunch production record templates currently in use are missing the following required information: serving size; menu type; planned number of portions (not filled in); total number of purchase units prepared; total number of portions prepared; milk types available and actual usage by type; and planned portion size and actual usage for condiments.

While there is no required production record template, there are some examples that may be used on our [Production Records](https://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](https://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.

Recipes Breakfast Items

If it becomes too time- or labor-intensive to record breakfast item (e.g. cereal, juice, muffin, etc.) usage by type on production records, consider using recipes. Individual recipes document average breakfast item usage by meal and grade group. When a breakfast item recipe is on file, total usage must still be recorded on production records. Recipes must be updated twice per year or when students' preferences change.

Portion Control

Proper portion size utensils should be used. They are especially important for self-service foods. Proper portion size utensils encourage students to take the planned portion and the amount required as part of a reimbursable meal. Signage may be added to the salad bar and meal service lines to aid students when selecting pieces of fruits and vegetables and cheese with tongs.

Signage is especially helpful when students are self-serving foods. Consider adding pictures or preparing a model tray with the amounts of each meal component that the menu planner expects the students to take.

Weight versus Volume

Use cup volume amounts when recording portion sizes on the production records for fruits and vegetables. Fruit sizes (e.g. case count) should also be recorded. This is the easiest way to ensure the meal pattern requirements are met. Weight and volume may not be used interchangeably for crediting purposes. A [portion control webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#pc) (https://dpi.wi.gov/school-nutrition/training/webcasts#pc), which describes portion control techniques and explains the difference between weight and volume, is available from the School Nutrition Team (SNT). Earn fifteen minutes of continuing education credit by viewing the webcast.

Whole Grain-Rich Requirement

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. The following grain products are not WGR: fried rice (SUPC 8890360), Sara Lee bread, dough bread white family pack (SUPC 1392596), long john donut (SUPC 2267748), and croutons. USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

The terms “wheat” or “made with whole grains” on a product label do not necessarily mean that a product is WGR. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole. Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients.

Corrective Action

- Meal Pattern Finding #1:** The current offering of ½ cup of fruit daily does not meet the daily (1 cup) and weekly (5 cups) minimum requirements for the fruit component. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Please refer to the required corrective action under Meal Pattern Finding #6.

- Meal Pattern Finding #2:** Missing component during the week of review. Students who selected the baked potato with taco meat or chili, winter blend vegetables, pears, and milk did not have access to the grain component. The daily minimum requirement is 1.0 oz eq of grain. The grain component was not missing from any other reimbursable meals offered during the month of review. **Incomplete meals claimed for reimbursement during the review period will be subject to fiscal action.**

Required Corrective Action: Please refer to the required corrective action under Meal Pattern Finding #6.

- Meal Pattern Finding #3:** The daily and weekly minimum requirements for vegetables were not met for lunch during the review period as a result of 1/2 cup of vegetables offered daily to students in grades K-2. The daily minimum requirement is 3/4 cup, and the weekly minimum requirement is 3 ¾ cup; 2 ½ cups were offered during the review period. Students in grades K-2 are restricted from the salad bar, which offers 1/2 cup vegetables daily to students in grades 3-8. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Please refer to the required corrective action under Meal Pattern Finding #6.

- ❑ **Meal Pattern Finding #4:** Weekly vegetable subgroup requirements were not met (K-2 red/orange and dark green; 3-8 dark green) during the review period. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Please refer to the corrective action under Meal Pattern Finding #6.

- ❑ **Meal Pattern Finding #5:** The weekly minimum requirement for grain was not met for lunch during the review period as a result of a peanut butter and jelly sandwich offered daily. The sandwich credited as 1.0 oz eq m/ma and 1.0 oz eq grain. The sandwich was offered with a choice of a string cheese or a yogurt, but no choice of grain was offered. The weekly minimum requirement is 8.0 oz eq; 5.0 oz eq were offered during the review period. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Please refer to the required corrective action under Meal Pattern Finding #6.

- ❑ **Meal Pattern Finding #6:** The daily minimum requirement for grain was not met for breakfast on February 15 as a result of breakfast bars (Hormel Breakfast Combos Ham, Egg, and Cheese Bar). Breakfast bars credit as 1.0 oz eq m/ma and 0.25 oz eq grain and must be bundled with other items so at least 1.0 oz eq of grain is offered to meet the daily minimum requirement and so these items can be counted as an item for the breakfast meal pattern. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Complete and submit menu planning worksheets for the K-8 age/grade group (attached), outlining planned portion sizes for all food items at breakfast and components at lunch, which meets both daily and weekly minimum requirements.

- ❑ **Meal Pattern Finding #7:** Insufficient crediting documentation for heart-shaped chicken nuggets (SUPC: 2213965), chili con carne without beans, and French toast sticks (SUPC 2744427) served during the review period.

Required Corrective Action: Submit product formulation statements (PFS) or Child Nutrition (CN) labels for these three items. If proper documentation cannot be obtained, discontinue using these products for school meals and submit crediting documentation for replacement products.

- ❑ **Meal Pattern Finding #8:** Insufficient portion size information required to credit orange chicken and taco meat towards daily and weekly meal pattern requirements.

Required Corrective Action: Submit portion size weights for level “ivory servers” of orange chicken and taco meat. Portion size weights will be evaluated against crediting documentation gathered onsite and against daily meal pattern requirements.

- ❑ **Meal Pattern Finding #9:** Current production records do not include all required information.

Required Corrective Action: Update production records to include the following missing information: serving site; menu type; planned number of portions (not filled in); total number of purchase units prepared; total number of portions prepared; milk types available and actual usage by type; and planned portion size and actual usage for condiments. **Please submit three full days of completed production records, updated to reflect these requirements.**

- ❑ **Meal Pattern Finding #10:** The required 1/2 cup fruit, vegetable, or fruit/vegetable combination statement is missing from signage.

Required Corrective Action: Add a statement to your current signage which explains a student must select at least 1/2 cup fruit, vegetable, or fruit/vegetable combination as part of his or her reimbursable meal. **Submit a photo of updated signage.**

- ❑ **Meal Pattern Finding #11:** Staff are not trained on OVS.

Required Corrective Action: Watch the Offer Versus Serve webcast on the [SNT Training webpage](http://dpi.wi.gov/schoolnutrition/training/webcasts#cyc) (<http://dpi.wi.gov/schoolnutrition/training/webcasts#cyc>). Submit a roster or checklist indicating all staff have viewed the webcast.

- ❑ **Meal Pattern Finding #12:** Fried rice (SUPC 8890360), Sara Lee bread, dough bread white family pack (SUPC 1392596), long john donut (SUPC 2267748), and croutons are not whole grain-rich products.

Required Corrective Action: Discontinue serving these items. Submit crediting documentation (e.g. Child Nutrition [CN] label, product formulation statement [PFS], complete nutrition facts label with ingredient statement) or standardized recipes as applicable.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and other) need to be separated by program and by the correct expense category. Proper allocation will also aid the school in calculating a “yearly” reference period for nonprogram food compliance. The 16-17 Annual Financial Report instructions are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- WUFAR source code 259 should include all catering revenue. The district should only abate revenues against expenditures if there is a return of goods.

Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. Juda School district has established an Unpaid Meal Charge policy to meet the needs of their student body. The policy is a nice model for other districts.

- 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 on Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- SFAs must attempt to issue a refund when student accounts have remaining funds. Any funds left “unclaimed” cannot be used to offset another student’s negative balance, unless *paid* households

have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding #1:** The 1516 SY and 1617 SY Annual Financial Reports are incorrect.

Corrective Action Needed: Amend both of these reporting years by printing a copy of the submitted report and manually adjusting the changes. Submit the updates via email attachment to the DPI accountant jacqueline.jordee@dpi.wi.gov. Copy the consultant.

- 2015-16 SY- the ending fund balance is incorrect. It should be \$10,059.94 per the PI-1505 Annual Report
- 2016-17 SY
 - The beginning and ending fund balances are incorrect. The beginning balance should be \$10,059.94 and the ending balance should be, \$3,661.11
 - The agency did not report the 1617 SY PLE non-federal funds transfer in the amount of \$1,783.10
 - A portion of the school food revenue must be allocated to nonprogram foods and the WSDMP
 - The expenses are allocated incorrectly by program. A portion of food and labor from NSLP should be allocated to WMMP and nonprogram foods

Paid Lunch Equity (PLE)

When running either the nonfederal tool or the split tool, the portion of nonfederal funds must be transferred to Fund 50 at the beginning of the school year. This is to ensure the funds are available for program operation throughout the year in lieu of student meal revenues that would have been received through a full or partial price increase.

Findings and Corrective Action: Paid Lunch Equity

❑ **Finding:** Non-federal funds noted on the 16-17 SY PLE tool were not transferred to the Fund 50 account.

Corrective Action Required: Make the 16-17 SY transfer in the amount of \$1,783.10 in the 17-18 SY. Submit a copy of the ledger documenting the transfer.

Note: Both the 16-17 SY and 17-18 SY PLE non-federal fund transfers will be recorded on the 17-18 SY Annual Financial Report under, "Paid Lunch Equity Transfers from Non-Food Service Account".

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, 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.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.

- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

$$\frac{\textit{Nonprogram food revenue}}{\textit{Total program and nonprogram revenue}} \geq \frac{\textit{Total nonprogram food costs}}{\textit{Total program and nonprogram food costs}}$$

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a “Nutshell”](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- Finding #1:** The Nonprogram Foods Revenue Tool has not been completed for the 16-17 SY or current school year.

Corrective Action Needed: Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool for Juda School District using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).

- Finding #2:** The cost of labor is not included when billing for internal or external caterings. Organizations are billed at food cost.

Corrective Action Needed: Begin covering all cost, which include labor and supplies when invoicing for caterings run through the food service account. Submit a statement outlining the actions the district will take to ensure all nonprogram costs are covered.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

Civil Rights Training

Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

Special Dietary Needs

- All food substitutions *made outside of the meal pattern* requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>).
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Fluid milk substitution rules apply to all federal school nutrition programs, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding:** Program materials did not contain the non-discrimination statement.
 - The calendar menu is missing the shortened statement, which is: “This institution is an equal opportunity provider”.
 - The newsletter does not contain the full USDA nondiscrimination statement.

Corrective Action Required: Update these materials to include the non-discrimination statement. Submit a copy of the updates to the consultant.

Local Wellness Policy

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Juda School District has established a great Local Wellness Policy (LWP) with measureable goals and objectives. This will make the review and assessment easier to complete in 2020. Highlights of the policy include providing 20 minutes for students to eat lunch from the time they are seated, lunch after recess, and discouraging food as a reward.

At a minimum, SFAs must include the below content in their wellness policy.

Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.
- An assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Resources:

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

Findings and Corrective Action Needed: Local Wellness Policy

Finding: SFA LWP does not designate one or more officials as being 'in charge' of the policy.
Corrective Action Required: Please provide a timeline for updating your policy to include this language.

Smart Snacks in Schools

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>).

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

Professional Standards: New Food Service Director Hiring Requirements

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. *A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.*
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).

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, substitute, 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

Director: 12 hours

Manager: 10 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

Non-school nutrition staff that have responsibilities that include duties related to the food service program: *job specific training < 4 hours

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

Findings and Corrective Action: Professional Standards

Finding #1: It is unclear who serves as the SFA’s food service “director”.

Corrective Action Needed: Establish a program director. Submit a statement to the consultant communicating the decision. The current food service “manager” fills the description of the food service director and would be grandfathered into the position having been hired prior to July 1, 2015.

Finding #2: Training is not monitored on a tracking tool.

Corrective Action Needed: Include all current training hours for each food service employee, including non-food service staff with food service responsibilities (e.g., financials, determining official, confirming official) onto the DPI tracking tool and submit as part of corrective action.

- ❑ **Finding #3:** Staff have not completed the required training hours for the current school year and were unable to provide a training plan.

Corrective Action Needed: Provide a training plan for meeting the required training hours for the all staff with food service duties. Part of the training plan must include completing civil rights training for the determining official and confirming official/book keeper. For Civil Rights Training, the attendance record and PowerPoint can be found on our [Civil Rights webpage](#). Submit a copy of the training plan and Civil Rights record to the consultant.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Buy American

Products from several categories (e.g. condiments, herbs and spices, frozen fruit and fruit juice) were not labeled with a country of origin, substituting this information for “packaged by” or “distributed by.” This made identifying compliance and noncompliance with the Buy American Provision challenging. The Food Service Director does not maintain a Buy American Noncompliant Product List. As part of Juda School District’s Procurement Review, SNT will check that the procurement manual includes language pertaining to Buy American. An additional attestation from food service’s distributors and/or vendors may be required. Further information is available on the USDA Foods [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>)

Food Safety Plans

The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Reviewer noted applesauce cups stored on shelving near chemicals. This is a violation of the agencies SOP #11 Storing and Using Chemicals, which states all chemicals are to be stored in designated secured area *away from and below food and food contact surfaces using spacing, separate shelves or partitioning.*

Corrective Action Needed: Conduct a 5-10 minute staff refresher training on SOP #11. Have staff sign off that they were in attendance and submit a copy of the attendance record to the consultant.

- ❑ **Finding #2:** The SFA is using milk barrels without an approved standard operating procedure (SOP). There are two options for use of milk barrels. One SOP uses time as a public health control, but does not allow for re-servicing of milk—all milk left in the barrels at the end of service is tossed. The other option allows for reserving milk left in the barrel as long as a temperature log is kept, which documents that milk has been maintained at 41 degrees Fahrenheit or below.

[Use of Insulated Milk Barrels: Time as a Public Health Control Option](#)

[Use of Milk Barrels: Monitoring of Temperature Option](#)

Corrective Action Needed: Submit a statement communicating which Milk barrel SOP the agency will use moving forward. Add this SOP to the SFAs food safety plan.

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

Comments/Technical Assistance (TA)/Compliance Reminders

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. SFAs can inform families of summer meals via the following methods:

- 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)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator

Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action: SBP and SFSP Outreach

- ❑ **Finding #1:** The agency did not conduct summer food service outreach in the 16-17 SY. Even though a summer feeding program is not operated at Juda School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months.

Corrective Action Needed: Submit a statement outlining how the agency will promote the summer food service program at the end of the 17-18 school year. This is an annual requirement.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The third grade Point of Service Counts (POS) for the Wisconsin School Day Milk Program must be recorded by marking who took a milk not by who "did not" take one. Back-out claiming systems are inaccurate and unallowable.
- As a reminder, the 1718 SY WSDMP claim, which will be submitted in June, 2018 must only include 1- ½ pint milk per student per day.

Findings and Corrective Action: Wisconsin School Day Milk Program

- ❑ **Finding #1:** After reviewing the 16-17 SY claim, reviewer found that the agency is claiming more than 1- ½ pint of milk per student per day. The KG classes have 2 milk breaks per day and the agency is claiming the F/R milks served for both breaks.

Corrective Action Needed:

- a. Discontinue claiming more than one milk per student per day. The agency can discontinue one of the milk breaks, begin charging households for the 2nd milk, or track and cover the cost with nonfederal funds. Milks served during a second milk break are considered nonprogram foods. Therefore, food service funds cannot subsidize the cost of offering a second milk break. Submit a statement outlining the actions that will be taken.
- b. Submit KG point of sale records from one milk break per day (morning or afternoon) during the 16-17 SY to support the number of F/R milks claimed in excess.

Part B corrected onsite. No further action required.

Fiscal action will be taken on 2nd milks from the KG classes during the 1617 SY.

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

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

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



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