

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

School Food Authority: School District of Alma Center – Humbird – Merrillan

Agency Code: 27-0091

School(s) Reviewed: Lincoln Jr. High

Review Date(s): 2/21/17 – 2/23/17

Date of Exit Conference: 2/23/17

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, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI 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 webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Alma Center School District for the courtesies extended during the on-site review. Thank you to the Food Service Director and Food Service Staff for being available when answering questions and providing additional information when necessary. Administrative and Food Service staff 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. It has been a pleasure working with you all this week.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

1. The January lunch, breakfast, and afterschool snack claims were validated and consolidated correctly.
2. The SY 15-16 Wisconsin School Day Milk claim was consolidated correctly.
3. Direct Certification (DC) has been run the required amount of times for the school year. The Determining Official does a great job running Direct Certification multiple times throughout the school year.
4. The correct letter templates regarding Free and Reduced Meal Applications, Verification, and Direct Certification were used.
5. Verification was done completely and well documented. Two applications were verified. It was completed before the November 15 deadline. The Verification Collection Report was submitted before the February 1 deadline.

Technical Assistance and Program Requirement Reminders

1. Be sure to record the correct eligibility start date into Skyward, which is the date DC is run.
2. Remember to run the Accuclaim report for all three schools when completing the lunch and breakfast claims.

Findings and Corrective Action Needed

Finding #1: One household is receiving free benefits that should have originally determined as reduced price eligible. There was a calculation error on the application.

- **Corrective Action Needed:** Notify the household, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the student's eligibility in the system, 10 calendar days from the date the notification letter was sent out. A letter was sent out on 2/24/17. No further action required.

Finding #2: One household is receiving reduced benefits that should have originally been denied benefits. There was a calculation error on the application.

- **Corrective Action Needed:** Notify the household, whose benefits will be decreased from reduced to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. A letter was sent out on 2/24/17. No further action required.

❑ **Finding #3:** One household is receiving free benefits that should have originally determined as reduced price eligible. There was a calculation error on the application.

- **Corrective Action Needed:** Notify the household, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. A letter was sent out on 2/24/17. No further action required.

❑ **Finding #4:** The meal price for lunch and breakfast is shown on the point of sale screen which is a form of overt identification.

- **Corrective Action Needed:** Work with Skyward to remove the meal price from the point of sale screen. Submit an email stating this has been fixed.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director at Alma Center School District. We appreciate your time and efforts spent preparing for and participating in the off-site and on-site review. All kitchens and service areas were clean, well-organized, and colorful. Food Service staff demonstrated sound knowledge of child nutrition program requirements. You were all a pleasure to work with!

It is required to post signage visible to the students that indicate the offered components in each meal and what they must select in order for their meal to count as reimbursable. Signage is an integral part to ensure students understand what components make up a reimbursable meal, and your signage was very impressive throughout the cafeteria!

Kitchen staff members are clear and confident about the Offer Versus Serve (OVS) requirements for lunch. All students observed took a reimbursable meal thanks to the diligence and teaching of the food service staff. It is evident the staff at Alma Center have received recent and thorough training; nice job!

Technical Assistance and Program Requirement Reminders

Smart Snacks

The [Smart Snacks Final Rule](#), published in the Federal Register on July 29, 2016, finalizes science-based nutrition guidelines for competitive foods sold on the school campus during the school day that were established in the Interim Final Rule (July 1, 2014). Foods and beverages sold in schools must meet both the general standards and the nutrient standards outlined in the final rule if they do not qualify for an exemption.

Under the General Standards, entrées, snacks, and sides must meet one of the following criteria:

- Be a whole grain-rich product
- Have a fruit, vegetable, dairy product, or protein food (meat, beans, poultry, etc.) as the first ingredient
- Be a combination food with at least ¼ cup fruit and/or vegetable

We recommend using the [Guide to Smart Snacks in Schools](#) and the [Smart Snacks Product Calculator](#) to assess product compliance.

Alternatively, items that do not meet Smart Snacks criteria may be sold beginning thirty minutes after the end of the instructional school day until midnight.

Findings and Corrective Action Needed

☐ **Finding #1:** At least 10% of the food and beverages available for sale to students was analyzed during the On-Site Administrative Review. Vending machines were operating during the school day with non-compliant items for sale. The reason the following items are deemed non-compliant is because the elementary and middle school students are in the building and have access to these products during breakfast and immediately after school.

- 100% juice in 10 fluid oz size – too large for elementary students
- Izze juices – not compliant for elementary students
- Reduced calories 12 fluid oz Gatorade – not compliant for elementary or middle school
- Zero calories 20 fluid oz Sobe Life Water - not compliant for elementary or middle school
- Propel – not compliant for elementary or middle school
- Diet Lipton Green Tea – not compliant for elementary or middle school due to caffeine

Corrective Action: Please only stock vending machines with compliant food and beverages under the All Foods Sold in School Rule during the school day, which begins at 12:01am and ends 30 minutes after the final bell rings. If vending machines are stocked with non-compliant items, the machines must be turned off during the school day. Please send your written plan to Molly.Gregory@dpi.wi.gov

☐ **Finding #2:** The FFA is selling fresh and fried cheese curds to students not during lunch or breakfast. This is an exempt fundraiser that must be tracked. The Wisconsin DPI allows two fundraiser exemptions per student organization per school year. An exempt fundraiser may sell foods and beverages on the school campus during the school day that are not allowable under the Smart Snacks rule. An exempt fundraiser may not exceed two consecutive weeks. Exempt fundraisers are not being tracked at the district.

Corrective Action: Begin using the [Exempt Fundraiser Tracking Tool](#) to track exempt fundraisers. Submit a copy of the tracking tool with fundraisers tracked as well as an email stating who will be in charge of tracking the exempt fundraisers.

3. RESOURCE MANAGEMENT

Commendations

The 16-17 Paid Lunch Equity Tool was well done. The 17-18 PLE tool was completed on-site.

Comments/Technical Assistance/Compliance Reminders

1. The Resource Management Risk Assessment Tool was completed with 1 flag. A comprehensive review of non-program foods was required.

2. 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> .

For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

4. GENERAL PROGRAM COMPLIANCE

Commendations

1. The Food Safety plan was well done and had all of the required components.
2. The first Food Safety Inspection was completed in January for all sites and the next inspections will be in May or June.
3. On-site monitoring forms for lunch and breakfast at each site were completed by February 1 and well documented.
4. Food Service Director does a great job making sure each staff member receives proper OVS training, as well as Civil Rights, Food Safety, and other required trainings to meet Professional Standards requirements.

Comments/Technical Assistance/Compliance Reminders

1. There are new on-site monitoring forms for [lunch](#) and [breakfast](#) listed on the SNT website.
2. Consider using the [DPI tracking tool](#) to track Professional Standards training hours for staff.
 - 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) name of training, and where the training was taken from (i.e. USDA webinar, DPI SNSDC course, etc.). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Findings and Corrective Action Needed

❑ **Finding #1:** An incorrect version of the USDA non-discrimination statement is printed on the menus and other signage used for the National School Lunch Program and School Breakfast Program.

Corrective Action Needed: Update the menus and signage to have the current non-discrimination statement: USDA is an equal opportunity provider. This was corrected on-site. No further action required.

5. OTHER FEDERAL PROGRAMS REVIEWS

Comments/Technical Assistance/Compliance Reminders

1. 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 of 2010 (HHFKA). 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.

The Wellness Policy should include:

- a. Specific measurable goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
- b. Nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
- c. 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.
- d. Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies on school website, social media, newspaper, or newsletters.
- e. Document public involvement, public updates, policy leadership, and evaluation plan.
- f. SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy.
- g. 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. Some methods of notification include mailing flyers, newsletters, emails, website postings, and newspaper articles.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

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

