

# USDA Child Nutrition Programs Administrative Review Summary Report

---

---

**School Food Authority:** Kenosha Unified School District **Agency Code:** 30-2793

**School(s) Reviewed:** Frank Elementary, Edward Bain School of Dual Language, Tremper High School, Washington Middle School

**Review Date(s):** 11/14/16-11/17/16

**Date of Exit Conference:** 11/17/16

---

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](http://dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, 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](http://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](http://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 Food Service Director, the Food Production Manager, the District Dietary Manager, Secretaries, and staff at the four review sites for the courtesies extended to us during the on-site review. It was helpful to have all of the requested documentation pulled and ready for the review. All of the work done prior to the review was much appreciated!

The Food Service Director, the Food Production Manager, and the District Dietary Manager have a great attitude and a willingness to learn. It is apparent that all three of them are passionate about their jobs.

The entire food service team is providing excellent customer service and the meals were colorful and appetizing. Strong efforts are being made to plan and implement meals which meet USDA meal pattern requirements and food service staff have been very open to suggestions on ways to bring meals into compliance.

## Review Areas

### 1. Meal Access and Reimbursement: Certification and Benefit Issuance, Verification, Meal Counting and Claiming

#### Commendations/Technical Assistance/Program Requirement Reminders:

- The benefit issuance list was forwarded to DPI prior to the onsite portion of the AR, as requested, to complete the statistical sampling of the students certified as eligible for free or reduced price meals at the non-CEP school. The names of 590 students were selected from the 5,302 eligible students to meet USDA's sample size requirements. Supporting documentation was pulled for students who were not directly certified in advance to streamline the AR site review process.
- A review of the free and reduced price meal applications pulled as support documentation revealed that district foodservice personal follow up with households when information was missing or further clarification was needed. Remember to date and initial any changes made by district staff to the original application. As discussed during the on-site review, follow USDA instructions by contacting households that report only annual income to ensure that the amount is an accurate reflection of the household's current income. Please see page 50 of USDA's *Eligibility Manual for School Meals – Determining and Verifying Eligibility - School Year 2016-17*.
- Food service administrative staff were available when the School Nutrition Team was on-site to answer question with answering questions, provide needed information and immediately follow up to resolve most AR findings needing corrective action.

Only 2 of the 590 students from the statistical sample were incorrectly approved for meal benefits.

**Finding:** Free meal benefits were extended to in error to students who reside in the household with a foster child. As explained during on-site portion of the AR, the direct certification match results include the names of student are foster children. The designation on the match result reports is "E" for a foster child. Only the foster child is categorically eligible for free benefits. Other students in the household qualify for free or reduced price meals if an application is submitted and household meets the specific income and family size guidelines. The income included on a free/reduced price application for the household exceeded the guidelines so other students are not eligible for free or reduced price meals.

**Corrective Action Taken:** The household was sent 10-day adverse action notice with appeal rights to indicate that the eligibility status of the non-foster care will change to paid on November 25, 2016.

**Response Needed:** Please confirm in writing that the district will extend free meal benefits to all students who match as "O", "S", or "T" or "E" and appropriately extended free meal status to other students in household match as "O", "S" or "T".

**Finding:** An error was made when entering income in the computer system. Weekly income reported by household was entered as yearly income. As a result, the students in the household were approved for free meal benefits. The correct status for the students in this household is reduced price.

**Corrective Action Taken:** The household was sent 10 day notice of adverse action with appeal rights. The status will change to reduced price meals on November 25 if the household chooses not to appeal the decision. No further action is needed.

### **Meal Counting and Claiming**

The October lunch claim was done incorrectly. Kenosha over-claimed 90 free meals and under-claimed 4 lunches.

**Finding:** The October lunch counts were consolidated incorrectly.

**Corrective Action Needed:** Submit the edit check reports for each school in the district for November. Submit a statement in writing (email) as to how you will ensure the correct counts will be submitted for reimbursement.

### **Verification**

Standard sampling was required. All households selected responded in a timely manner. The DPI templates and forms were used. Verification was completed by November 15 and the Verification Collection Report was submitted on November 15.

## **2. Meal Pattern and Nutritional Quality: Meal Components and Quantities, Offer versus Serve, Dietary Specifications and Nutrient Analysis**

### **Appreciation/Commendations/Noteworthy Initiatives:**

The menus from the week of October 17-21, 2016 that were reviewed were **all** in compliance with all weekly meal pattern requirements. This is impressive considering the number of menus and entrée options that were evaluated. Excellent job, especially the Food Production Manager for her careful menu planning and thorough documentation!

### **Technical Assistance:**

Frank Elementary School (Lunch reviewed)

### **Signage**

It is required that signage be posted near the beginning of the serving line which explains to students how to select a reimbursable meal, including the requirement to select at least three out of five components at lunch (and at least 3 out of 4 items at breakfast) and that at least ½ cup of fruit or vegetable must be selected. There is signage posted at Frank Elementary; however, it explains what students should take based on packages (hot pack, cold pack, extra veggie pack, milk). The signage should really identify the five components (food groups) that are offered. Additionally, signage is most helpful when it uses the specific daily menu items.

### **Milk Variety**

One of the Headstart (pre-kindergarten classrooms) did not offer a variety of milk to students at lunch, only 1% white milk was available. It sounded like this is not necessarily usually the case, as a classroom assistant who typically packs up the meals and milk was not there today. We discussed the requirement to provide at least two types of milk every day at lunch with one of the teachers, who agreed to make sure this happens every day. If the Headstart teachers prefer to avoid chocolate milk, they can offer 1% white

and skim white and be in compliance. Milk variety was not an issue in the cafeteria or in the other pre-kindergarten classroom.

### **Offer vs. Serve**

Offer vs. Serve is implemented at Frank Elementary, although it is fairly limited due to the pre-pack nature of meals. However, on the day of review, if students were to decline the hot pack (burger patty and ¼ cup tater tots), she would require the students to select the cold pack (bun and ½ cup apples), milk, and the separate pack of ½ cup carrots. Please be aware that under Offer vs. Serve, students would have a reimbursable meal if they selected just the milk and the cold pack (bun and apples), or if they selected just the carrots and the cold pack (bun and apples). Students should be allowed to select these combinations. It is recommended to provide information to serving staff each day about exactly which combinations of foods/pre-packs the students could select at a minimum for a reimbursable meal.

### Edward Bain Dual Language School (Breakfast and lunch reviewed)

#### **Breakfast in the Classroom Service Model**

One of the teachers commented that “[breakfast] would be better in the cafeteria.” We recommend sharing the link to this video about Universal Free Breakfast and Breakfast in the Classroom with the teachers to help them understand the benefits of offering breakfast in the classroom:

<https://www.youtube.com/watch?v=BBvy9U6JyXc>.

### **Offer vs. Serve**

In one of the classrooms for breakfast, the teacher was requiring the students to take a milk with their breakfast pack. Technical assistance was provided that under Offer vs. Serve, students can choose to decline milk (as the pre-pack doesn’t allow students to decline any other items). This information was clearly communicated to teachers on the instruction sheet that is attached to the lid of the bin containing the breakfast kits, but some teachers may need a refresher on this information.

### **Signage**

Signage is posted in the cafeteria which sufficiently communicates to students how to select a reimbursable lunch; however, there is no signage that is specific to breakfast. With the Breakfast in the Classroom model, signage is not required to be posted in each classroom. However, signage should be posted in a common place, such as the main entrance or the cafeteria that specifies the food components offered at breakfast, including the requirement to select at least ½ cup fruit (although all student will select 1 cup by default as it is included in their pre-pack).

### Washington Middle School (Lunch reviewed)

No technical assistance related to meal pattern was required for this review.

### Tremper High School (Breakfast and lunch reviewed)

No technical assistance related to meal pattern was required for this review.

### Central Production Kitchen

#### **Recipes**

The recipe for the taco bar served at the middle school and high school should be updated to reflect that 32 chips are served to each student (rather than 28 chips). The correct amount is being served to credit as 2 oz eq. of grain but the recipe has not yet been updated to reflect the current product/practice.

### **Production Records**

The menu and production record for Pre-K (Headstart) lunch for Thursday 10/20/16 lunch just lists “1/4 cup fruit.” Even if a specific type of fruit was not yet planned at the time the menu and production records

were typed, it is strongly recommended that the exact type of fruit/product that was served be handwritten in on the production record so that records reflect the product that was served.

For the yogurt served for pre-kindergarten (Headstart) lunch on Tuesday, 10/18/16, the menu lists the portion size as 4 oz. but the production record just says “1 each” yet indicates that yogurt is in bulk. The portion size of the yogurt should be included on the production record.

#### **Corrective Action**

**Meal Pattern Finding #1:** When breakfast is served in the classroom, signage is not required to be posted in each classroom. However, signage should be posted in a central location that students access during the day, such as the cafeteria. There was no breakfast-specific signage posted at Edward Bain Dual Language School.

**Required Corrective Action:** Submit a copy or photo of signage posted at Bain that explains to students how to select a reimbursable breakfast (including the components and the requirement of at least ½ cup of fruit). **This was completed on site; no further corrective action is required.**

#### Smart Snacks

##### **Technical Assistance**

At Frank Elementary, the popcorn that is sold by the PTO to students in classrooms on Tuesdays (prepared from 1 cup of popcorn kernels and ¼ cup of popcorn-popping oil [flavored canola oil]) does **not** meet the Smart Snacks standards. A written recipe for the popcorn was not provided for this Administrative Review, but the quantities of ingredients used and portion size was obtained from principal Heather Connolly. The percentage of calories from fat exceeds the 35% limit for the nutrient standards for snacks (with 47.5% of calories per serving from fat). As a reminder, the nutrient standards for foods are listed on the “Smart Snacks in a Nutshell” handout at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>. Because this occurs regularly on Tuesdays, it cannot qualify as an exempt fundraiser. The popcorn recipe should be modified to be compliant or the practice should be discontinued. The Smart Snacks Recipe Analyzer Tool (available at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) could be used to document the popcorn recipe.

The teachers who oversee food/beverage sales at Tremper High School should make sure they save actual labels from products, rather than just printouts from caloriecount.com, which were provided for a few of the products. Also, it might be beneficial to use the Smart Snacks tracking tools to keep track of the exempt fundraiser and compliant food and beverage sales that do occur. These tracking tools are available at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks> under “Resources.”

#### **Corrective Action**

**Smart Snacks Finding #1:** The popcorn sold on Tuesdays in classrooms does not meet the Smart Snacks standards, with the percentage of calories from fat exceeding the limit of 35%.

**Required Corrective Action:** The Food Service Director provided a copy of a compliant popcorn recipe that was provided to building principals at the beginning of the year, which they should be following. The Food Service Director will follow up and make sure this recipe is being used. **This sufficiently addresses the finding; no further corrective action is required.**

### **3. Resource Management: Risk Assessment and Comprehensive Review of Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, Indirect Costs**

### **Commendations:**

Thank you for sending in all of the non-program foods documents ahead of time.

### **Comments/Technical Assistance/Compliance Reminders:**

- 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: Civil Rights, On-site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in Schools, Professional Standards, Water, Food Safety, Storage and Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach**

### **Comments/Technical Assistance/Compliance Reminders:**

#### **Civil Rights**

The district used the current DPI-SNT template to notify households when students were directly certified for free meals. This template includes the required non-discrimination statement.

**Finding:** The notice sent to households with students approved for or denied free or reduced price meals based on an application included the abbreviated version of the non-discrimination statement. These notices must include the longer version to meet USDA regulations. Schools are encouraged to download and use current templates posted on DPI website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>.

**Corrective Action Needed:** Move forward to use the required long version of the non-discrimination statement on all notices sent to households pertaining to free or reduced price meal benefits.

**Response Needed:** Please specify date in writing of when the notices will be changed to meet requirements in the response to this report.

#### **Overt Identification**

**Finding:** The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal prices for student meals (i.e., \$2.80, .40, 0.00) are visible on the computer screen that can be seen by students, which constitutes overt identification. While on-site at Tremper High School, this was noted.

**Corrective Action:** Work with the software company to remove these prices or change the prices of the reduced-price and free students.

#### **On-site Monitoring Forms**

All forms were completed correctly and completely for the schools in the district operating the NSLP and SBP.

## Local Wellness Policy Summary for Administrative Review

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.

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.

### 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. SFAs are required to review and consider evidence-based strategies in determining these goals. Evidenced based is defined as strategies that have been studied, evaluated, and peer reviewed. At a minimum, USDA FNS expects SFAs to review Smarter Lunchroom tools and strategies. Information on Smarter Lunchroom strategies can be found at: <http://dpi.wi.gov/team-nutrition/smarter-lunchrooms>.
- 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.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

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. 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.

A summary of the requirements can be found at:

[https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary\\_finalrule.pdf](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>.

### Food Safety

Food safety plan at each of the reviewed schools include required elements, per USDA guidance. All cold storage and food hold temperature logs, calibration logs and sanitizing solution logs are maintained to support the food safety plan. Each school receives 2 food safety inspections as evidences by health department reports kept on file. The most recent inspections are posted in a publicly visible location. Safe

food handling practices were observed. The Food Production Manager works with local health department to ensure policies and procedures comply with Wisconsin Food Code.

### **Buy American**

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above ( “non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

### **Professional Standards**

The professional standards tracking tool was completed and well done. Be reminded to include where the training was from, i.e. DPI, USDA, created by someone at the district, etc.

### **Afterschool Snack Program**

Point-of-service snack counting systems are in place at the two schools reviewed: Frank Elementary and Washington Middle School. Accurate counts were recorded by after school staff. Documentation supports claim for reimbursement. Safeguards are in place to ensure one snack claimed per day is claimed. Daily production records include the two required components.

Education/Enrichment Activities offered before, during, or after the snack service to meet USDA requirements. Documentation shows that necessary monitoring reviews are conducted (two required on-site reviews/one within first four weeks; second later in school year). Food safety plan includes standard operating procedure for this program.

### **Fresh Fruit and Vegetable Program**

Teachers are doing a wonderful job administering this program. The teachers are doing nutrition education in the classroom. They are doing a fantastic job teaching the students about nutrition. Keep up the good work!

### **Wisconsin School Day Milk Program**

Not all check off sheets were entered for the claim due to teachers not handing check off sheets in to food service office in a timely manner at the end of the school year. This resulted in an under claim for the 15-16 school year which was ultimately a local decision.

### **Summer Food Service Program**

This program is offered to students in summer school. Kenosha does a nice job notifying the families this is available to the students.

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

