

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

---

**School Food Authority:** Onalaska School District

**Agency Code:** 324095

**School(s) Reviewed:** Eagle Bluff Elementary School

**Review Date(s):** April 17-18, 2018

**Date of Exit Conference:** April 18, 2018

---

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- 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 Onalaska 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 incredibly receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff at Onalaska School District for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menus, local wellness policy, and an overall positive environment. We were impressed during meal service that all staff interacted with students, encouraging them all to try new foods.

The DPI review team is extremely confident that Onalaska School District will continue to improve its knowledge and operation of school nutrition programs. Thank you!

---

## **REVIEW AREAS**

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

#### **Certification and Benefit Issuance**

##### **Commendations:**

All denied applications were completed correctly and all required notification letters sent to households were formatted appropriately. Thank you for including disclosure forms within application packets sent to households. The school nutrition director and staff are very knowledgeable in this area of the review. Additionally, thank you for distributing the public release as required.

##### **Technical Assistance:**

- During the initial approval of applications, on the Determining Official is required to sign the back of applications. The Confirming and Verifying Officials are only required to sign the applications selected for verification.
- The backs of applications approved/denied at the SFA did not list the total calculated income. However, the SFA has a good understanding of calculating the total income. It is only a matter of displaying this knowledge on the applications.

##### **Compliance Reminders:**

- “Error-prone applications” are those with reported income within \$100 monthly or \$1,200 yearly of the free and reduced price income eligibility levels.

#### **Findings and Corrective Action Needed: Certification and Benefit Issuance**

**❑ Finding #1:** Three application errors were observed. Four students were receiving free benefits when they qualified for reduced meals. An additional four students

were receiving free benefits when they did not qualify for either free or reduced price meals. No fiscal action will be calculated.

**Corrective Action Needed:** Completed onsite. No further action required.

**Finding #2:** While sorting through applications, it appeared the determining official could use a refresher of the application process.

**Corrective Action Needed:** Please complete the [Processing Applications and Direct Certification](https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html) webcast and send the email confirmation to the consultant assigned to your review ([https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html)). Thank you!

---

### Verification

#### **Commendations:**

The verification process was completed within the required timeframe and the verification method was appropriately utilized. All applications selected for verification were verified correctly. Great work!

#### **Technical Assistance:**

- Although applications were verified correctly, the review team would like to emphasize the importance of double-checking the frequencies of pay stubs as verification documentation. One application originally reported income monthly; however, pay stubs were provided to the household bi-weekly. This information needs to be accurately transferred to the original application when confirming the original benefit status.
- Two different “we must have” letters were sent home for verification. In order to reduce confusion, it is recommended only one letter is sent to households.

---

### Meal Counting and Claiming

#### **Commendations:**

Thank you for providing proper edit checks and meal counts. All counts and claims appeared accurate, and the point of service runs very smoothly. Great work!

---

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

#### **Commendations**

Thank you to all staff at Onalaska School District for the warm welcome and cooperation extended during this Administrative Review (AR). Thank you to the Food Service Director for sending all documentation prior to the onsite visit as this helped expedite the AR process. All school nutrition professionals in the kitchen were pleasant, hardworking, and did a great job preparing and serving meals to students. Signage around the cafeteria was visually-pleasing, promoted Farm to School (F2S), and showed students how to select a reimbursable meal.

Onalaska School District does a commendable job with their F2S program. They do a Harvest of the Month with menu items like dried beans, kale, rhubarb, and yogurt for students to try. Registered Dietitians from the surrounding area come and do MyPlate lessons and sample some of these items with students and kids dress in the color of their favorite vegetable! The Food Service Director sends out a F2S survey every year to parents at each school in the district to assess likes, dislikes, and goals related to F2S. Every school has a garden tower for year-round, indoor growing power. Herbs and vegetables like basil, dill, cilantro, and lettuce are grown in the towers. There are also gardens at the schools, which families help maintain over the summer. Onalaska School District partners with other school districts in the area to promote and lead F2S efforts in the state. This has and will continue to benefit students, who are more likely to try fruits and vegetables if they helped grow them or know where they come from. Great job serving healthy, nutritious meals to the students of Onalaska and being a pioneer in the F2S movement!

## **Technical Assistance**

### Training

Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check the [training webpage](http://dpi.wi.gov/school-nutrition/training) often for current and upcoming opportunities ([dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training)). All members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website ([dpi.wi.gov/school-nutrition/directory](http://dpi.wi.gov/school-nutrition/directory)).

### Applesauce Cups

The applesauce cups found in dry storage were 4.0 ounce (oz.) cups. Keep in mind that a 4.5 oz cup of applesauce is needed to credit as  $\frac{1}{2}$  cup fruit. Therefore, the 4 oz. cups will result in a fruit shortage if this is the only fruit offered for the day under the K-8 meal pattern. This will also be a concern with Offer versus Serve (OVS) and reimbursable meals if this is the only fruit and/or vegetable on a student's tray. For example, if a student's tray consisted of a chicken patty on a bun (2.0 oz. eq. meat/meat alternate (M/MA), 3 oz. eq. grain) and a 4.0 oz. applesauce ( $\frac{3}{8}$  cup), this will not meet the  $\frac{1}{2}$  cup fruit and/or vegetable requirement for a reimbursable meal. Going forward, consider purchasing 4.5 oz applesauce cups, or ensure that more fruit is offered that day and that students have the required  $\frac{1}{2}$  cup fruit and/or vegetable on their tray to make a reimbursable meal.

### Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. The production record template currently in use has missing information, such as planned number of meals (breakfast), planned number of servings, planned number of servings in purchase units, and actual total number of purchase units prepared. Keep a lookout for the updated production record requirements coming out this summer. Be sure to update current production records with this list.

While there is no required production record template, there are examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Make sure everything offered as part of a reimbursable meal is recorded on production records, including everything offered on the salad bar or any special dietary needs. This helps ensure the meal pattern is being met for the age/grade group served. It may also be helpful to include crediting, or how a menu item contributes to the meal pattern, on the production records.

### Standardized Recipes

Any menu item that is made in-house with more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. There were a few menu items offered during the week of review that did not have a standardized recipe, including the deli sandwich and breakfast sandwich. Please use our [recipe tools and resources](#) to aid in the recipe standardization process (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

There is also a checklist of information necessary to standardize a recipe, calculators to assist with nutrient analysis, and a template to help organize the information. Continue to work towards recipe standardization by viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>), or [contact a Public Health Nutritionist](#) for assistance (<https://dpi.wi.gov/school-nutrition/directory>).

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

#### Non-reimbursable Meals

Two students at Eagle Bluff Elementary School selected a non-reimbursable meal during lunch meal observation on 4/17/18. One student's meal contained two cucumber slices, 1/8 cup fruit cocktail, milk, and a chicken patty on a bun, which did not meet the ½ cup fruit and/or vegetable requirement. The other student's meal contained three carrots, milk, and a chicken patty on a bun, which did not meet the ½ cup fruit and/or vegetable requirement. Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.

**Finding #3:** No standardized recipes were provided for the deli sandwich or breakfast sandwich.

**Corrective Action Needed:** Submit standardized recipes for the menu items list above with all required items (e.g. yield, ingredients, detailed instructions, etc.). A [Recipe Template](#) may be used (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>).

**Finding #4:** There is a weekly grain shortage at breakfast during the week of review when the alternate entree was offered, which consists of a cereal choice (1.0 ounce equivalent (oz. eq.) or 1.25 oz. eq. grain options). This does not meet the weekly 7.0 oz. eq. weekly grain requirement at breakfast.

**Corrective Action Needed:** Submit a statement explaining what will be added to the alternate cereal choice at breakfast so that the weekly grain requirements are met. Include any applicable crediting documentation and/or labels. **The Food Service Director will add a 1.0 oz. eq. graham cracker with the alternate cereal choice, daily. Corrective action complete. No additional action required.**

*Repeat violations of a daily grain shortage at breakfast during subsequent Administrative Reviews may result in fiscal action.*

**Finding #5:** There was a starchy vegetable shortage during the week of review at lunch. Only ¼ cup of peas were served and there is ½ cup requirement.

**Corrective Action Needed:** Submit a statement explaining what will be added to the week of review so that the weekly starchy vegetable subgroup requirement is met. **The Food Service Director will add peas to the salad bar, daily, with 1/8th cup as the serving size. Corrective action complete. No additional action required.**

*Repeat violations of a vegetable subgroup shortage at lunch during subsequent Administrative Reviews may result in fiscal action.*

**Finding #6:** There was a weekly grain shortage at lunch during the week of review. Only 5.75 oz eq. grain was offered. This does not meet the 8.0 oz. eq. grain requirement for the K-5 meal pattern. The following combination of entrees resulted in the weekly grain shortage.

Monday: crackers (1.0 oz. eq. grain)

Tuesday: crackers (1.0 oz. eq. grain)

Wednesday: taco shell (1.0 oz. eq. grain)

Thursday: spaghetti (0.75 oz. eq. grain) and breadstick (1.0 oz. eq. grain)

Friday: crackers (1.0 oz. eq. grain)

Total: 5.75 oz. eq. grain

**Corrective Action Needed:** Submit a statement explaining what will be added to the week of review so that the weekly minimum oz. eq. grain requirement is met for the K-5 meal pattern. Include serving sizes, applicable labels, and days items will be added. **The Food Service Director will no longer offer the yogurt, cheese stick, and crackers as an alternate option. The only two entree options daily will be the main entree and the Ham Deli Sandwich. This menu meets the weekly grain requirement for the K-5 meal pattern. Corrective action complete. No additional action required.**

*Repeat violations of a daily grain shortage at lunch during subsequent Administrative Reviews may result in fiscal action.*

---

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### **Commendations:**

The staff are very knowledgeable and thorough regarding the food service account. An unpaid meal charge policy was available at the SFA and no unallowable or indirect costs were observed. Great work!

##### **Compliance Reminders:**

- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance".
- When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. On the claim, money may be deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

#### Findings and Corrective Action Needed: Revenue from Non-program Foods

**❑ Finding #7:** There are discrepancies between SNT's Annual Financial Report (AFR) and the annually audited report regarding the school foodservice account due to miscommunication between the food service director and bookkeeper. Specifically, the total revenue and expenditure on the AFR are of a lower value when compared to the audited report.

**Corrective Action Needed:** Please submit an explanation to the consultant assigned to your review detailing why these discrepancies occurred and how they will be prevented in the future. Thank you!

**Resources:**

- The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).
- Information on Entitlement Values regarding USDA Foods may be found on SNT's [Financial Information](https://dpi.wi.gov/school-nutrition/usda/financial) webpage (https://dpi.wi.gov/school-nutrition/usda/financial).

---

**Paid Lunch Equity (PLE)**

**Commendations:**

Thank you for accurately completing the paid lunch equity tool!

---

**Revenue from Non-program Foods**

The SFA sells non-program foods beyond just adult meals and milks only, and therefore, a comprehensive review of this area was completed.

**Compliance Reminders:**

- The USDA Non-program Revenue Tool must be completed yearly, at a minimum.
- All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

**Findings and Corrective Action Needed: Revenue from Non-program Foods**

**Finding #8:** The non-program foods revenue tool was not completed yet for this school year.

**Corrective Action Needed:** Please complete the tool using a 5-day reference period and sent it to the consultant assigned to your review.

---

**4. GENERAL PROGRAM COMPLIANCE**

**Civil Rights**

**Commendations:**

The “And Justice For All” poster was prominently displayed in a publicly visible location. All required staff completed the annual civil right training and the civil rights compliance form (PI-1441) was completed by the October 31 due date. Special dietary needs are handled appropriately and the SFA utilizes DPI’s special diets form. A policy is in place for processing civil rights complaints as well. Additionally, the point of service prevented overt identification of the students’ benefit status. Thank you!

---

### On-site Monitoring

#### **Commendations:**

All required on-site monitoring forms were completed. Great work!

#### **Compliance Reminders:**

Every school year, prior to February 1, each SFA with more than one school must perform no less than one on-site review in each school operating the NSLP and 50% of schools operating the SBP.

---

### Local Wellness Policy

#### **Commendations:**

The school nutrition director has a clear understanding of the requirements regarding the Local Wellness Policy. It is clear the school nutrition staff and SFA as a whole are committed to the healthy environment of their schools. Thank you!

---

### Professional Standards

#### **Commendations:**

Thank you for tracking all director, manager, and nutrition staff trainings utilizing DPI’s training tracker with all required components. Nearly all trainings are complete for this school year. Great work!

#### **Technical Assistance:**

- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).

#### **Compliance Reminders:**

- 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.
- Annual Training Requirements:
  - Directors: 12 hours
  - Managers: 10 hours
  - Full-time Foodservice Staff (20 hours or more per week): 6 hours
  - Part Time Non-Foodservice Staff (under 20 hours per week): 4 hours

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

<p><u>Findings and Corrective Action Needed: Professional Standards</u></p>
---



**Finding #9:** Professional Standards trainings were completed for all point of service, non-nutrition staff, however, they were not documented.

**Corrective Action Needed:** Corrected onsite. No further action required.

**Resources:**

- 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>).
- 

**Water**

Thank you for having free, potable water accessible to all students without restriction during meal services!

---

**Food Safety and Storage**

**Commendations:**

Thank you for having all required standard operating procedures. The food safety plan was site-specific and contained all required employee reporting agreements. No storage violations were observed.

**Technical Assistance:**

- While milk temperatures are in the correct temperature zone, it is recommended milk coolers are closed in between services to reduce the risk of milks going into the temperature danger zone.

**Compliance Reminders:**

- The food safety plan is required to be reviewed each school year. Additionally, employee reporting agreements are not required to be updated each school year.
- 

**Buy American**

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

Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification.

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

**Finding #10:** The following product was identified in Eagle Bluff Elementary School's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant list:

- Pineapple Tidbits (Thailand)

**Corrective Action Needed:** Complete and submit a [Non-Compliant Product Form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) for the product listed above (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

---

### **Reporting and Recordkeeping**

**Commendations:**

All records are retained for the required three years plus the current school year. Additionally, temperature logs only need to be kept for six months. Thank you!

---

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

**Commendations:**

The SFA offers free summer meals and does a wonderful job with SFSP outreach. Thank you!

**Technical Assistance:**

- SBP outreach must be distributed to all households prior to the beginning of the school year. It is recommended the SFA notify households throughout the school year as well.
- 

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Wisconsin School Day Milk Program (WSDMP)**

**Commendations:**

The WSDMP at the SFA is beautifully coordinated; it's wonderful to see students involved in the program. All counts were taken appropriately and the annual claim had no issues. Great work!

**Technical Assistance:**

- The SFA currently does not offer juice as a substitute for students with special dietary needs regarding milk. Juice is the only acceptable and claimable substitute for the WSDMP. All students at this time that have special dietary needs choose not to participate in the program. No free or reduced priced students have special dietary needs at this time. In the future, if there are any free and/or reduced priced students who cannot consume milk want to participate in the WSDMP, 100% full-strength juice in an 8 fl. oz. portion must be offered.
- 

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

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

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



*With School Nutrition Programs!*