

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

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**School Food Authority:** Benton School District

**Review Date(s):** 12/18/18–12/20/18

**School(s) Reviewed:** Benton Middle School

**Date of Exit Conference:** 12/20/18

**Agency Code:** 330427

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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](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, 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](http://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 Benton School District for the courtesies extended during the on-site review. Thank you for being available when answering questions and providing 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.

The staff members did an excellent job preparing for the review, and were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the nutrition programs. The food service staff were welcoming, knowledgeable, and clearly dedicated to their work. The cafeteria was inviting and festively decorated, which added a special appeal.

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## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### **Commendations:**

- Of the 64 eligibility determinations reviewed, one error was identified. These errors have been recorded on the SFA-1 form and are used to determine an error percentage. The error percentage was 1.56%, which is low enough to not require an independent review of applications or benefit issuance fiscal action.

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

##### Application Determination

- When processing income applications, it is necessary to completely fill out the back, bottom portion of the application designated for “school use only.” The applicable total income, income frequency, household size, categorical eligibility information, and denial information should be completely filled in along with the determining official’s signature and date of processing. Some applications reviewed at the SFA were missing pieces of this information.

##### Household Communications

- When a household is contacted to clarify information reported on an income application, the determining official should document the details of the communication. Additionally, if the application is edited by the determining official, the edits should be initialed and dated to indicate that the edits were based on additional clarification and not part of the initial application. Several applications contained edits by the determining official based on household communications, but the details were not noted and there were not initials/signatures or dates documented.

##### Program Names for Case Numbers on Applications

- Beginning in the school year 2018-19, WI DPI requires that program names be reported with case numbers when provided on an application. Applications with case numbers but no program name listed are considered incomplete until the missing information is obtained from the household. As a reminder, only Food Share, W-2 Cash Benefits, and FDPIR programs can be listed with case numbers on applications. Badgercare and Medicaid are not eligible programs for categorical eligibility on applications.

##### Direct Certification (DC) Letters

- When sending DC notification letters to households, it is appropriate to include the names of the children that matched to DC themselves along with any additional children known to be residing in the same household that did not match to DC but are eligible by extension. As a reminder, E codes (indicating foster child status) do not extend to other children in the household.

##### Carryover

- While the SFA’s procedures for obtaining completed applications and running direct certification (DC) make 30-day carryover a rare occurrence, it is important to note some key points pertaining

to carryover. If a child shows up as an “N” code (indicating no participation in eligible assistance programs) on DC during the 30-day carryover period, this is not considered a new determination and the prior year’s free or reduced status is not discontinued at that time. Only a new application, match to an eligible program on DC, or categorical eligibility with proper documentation are considered new determinations that would thus end any carried over benefits.

#### Direct Certification (DC) Precedence

- DC matches are the most preferred way to establish students’ eligibility and generally take precedence over other methods of eligibility establishment. However, the student must always receive the best benefit they are eligible for. If a student is free eligible via DC and then an application is received for this student, the application should be retained but would not need to be processed for this student since the benefit could not be better than the free benefit already established by DC.
- On the other hand, if a student is reduced eligible via DC and an application is received that qualifies the student for free meals, then the application must be processed and the free benefit based on the application would replace the DC reduced benefit effective the date the application was processed since the application supports a better benefit.

#### Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child’s former school, if the child has an individual eligibility determination. Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student’s previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year.
- Wisconsin DPI requires source documentation of the student’s previous eligibility. Source documentation means that the information originally used to determine the student’s meal eligibility is shared with the school requesting the information for the new or transfer student. Source documentation may include a copy of the original application or a copy of a DC run with the student’s name listed. A phone call or copy of a benefit approval letter are examples of documentation that would not be sufficient to establish the new or transfer student’s eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.
- Source documentation for students transferring in from out-of-state (such as a nearby border state) can be obtained from the out-of-state SFA. The determining official within the Benton School District would need to ensure that any applications with program case numbers obtained as source documentation from out-of-state SFAs are legitimate, as case number formats for different programs in different states may vary. For example, a SNAP case number reported on an Iowa meal application may not be the same length or format as a SNAP case number in Wisconsin (i.e. Food Share number).

#### Disclosure

- 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 Agreement for School Staff](#) form is located on the SNT website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>). An example would be a school secretary receiving a student’s free/reduced eligibility information with parental consent for the purpose of waiving school registration fees—the secretary in this scenario should complete a disclosure form.

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

- ✓ **Finding A:** One application was submitted with a case number indicated as Food Share that did not fit the 10 digit format of such case numbers. Follow up with the household resulted in a 16 digit case number provided. The application also contained income information but was missing the names of all household members. The application was approved for free benefits despite the conflicting and missing information.

**Corrective Action:** The determining official followed up with the household to obtain household members information to allow that application to be considered complete. The completed application with all necessary income information resulted in a free benefit determination, and thus the household experienced no change in benefits. *No further action required.*

- ❑ **Finding B:** The determining official did not send written notifications of application denial to households. Written notification of application denial is required and must contain specific information, per the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) page 56 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>). Phone calls or strictly verbal notifications do not meet this requirement. This was also a finding on the last administrative review.

**Corrective Action:** Submit a copy of the denial letter that will be utilized immediately when submitted applications are denied. Please be sure the letter meets all requirements. The [DPI template approval/denial letter](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/letter-to-households.doc) may be used at the SFA's convenience (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/letter-to-households.doc>). Along with the copy of the letter, submit a statement acknowledging the requirement to notify denied households in writing and describing how this requirement will be met going forward.

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## **Verification**

### **Technical Assistance:**

#### **Error Prone**

- An application is considered “error prone” if the reported income is within \$100 per month or \$1200 per year of the applicable income eligibility guidelines. While all applications submitted have the potential to contain errors, the term “error prone” is only used to describe applications within the income range described above.
- Please note that the standard sample size for verification requires that applications selected for verification be chosen from error prone applications approved as of October 1. The SFA misinterpreted the term “error prone” and thus reported the incorrect sample size on the verification collection report. See corrective action below.

#### **Official Roles**

- While the verification process was completed correctly, there was confusion over the role of the confirming official in the process. The determining official is responsible for processing submitted applications and determining the benefit the household is eligible for. Before verification activities can begin, a designated confirming official must review each approved application selected for verification to confirm that the initial benefit determination was accurate. The confirming official does not need to double check all applications processed by the determining official—just those selected for verification. After the confirming official confirms the initial determination on the selected applications, then the verifying official may begin the verification process by contacting the household to request supporting documentation. If the confirming official disagrees with the initial determination, then specific procedures must be followed to proceed with verification.

Please reference pages 103-104 of the [Eligibility Manual](#) for additional information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

### **Findings and Corrective Action Needed: Verification**

- ✓ **Finding C:** The verification collection report indicated that the standard sample size was used. However, review of verification materials indicated that alternate one sample size was actually used. Therefore, the report did not accurately report the verification process.

**Corrective Action:** The determining/verifying official edited the verification collection report and resubmitted it with the corrected information. *No further action required.*

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## **Meal Counting and Claiming**

### **Technical Assistance:**

#### **Entity Coding in Software**

- Software systems used in school food service typically involve students being coded to the specific school in which they are enrolled. This allows for reports to be generated that separate out school-specific information, such as edit check reports used for claim submission. The SFA has all students coded to the district entity, thus requiring reports to be run with graduation year parameters to break out meal counts by school. While the graduation year parameters appear to yield accurate meal counts by school, it is worth investigating why the software is not currently set up to code each student to their school they are enrolled in.

#### **Visiting Students**

- Please note that SFAs may claim visiting students outside of the district in the paid category or the individual's benefit category with documentation, unless they are from a CEP school. In order to ensure the full meal cost is covered when serving visiting students, it is recommended to either charge the student the paid student price and claim in the paid category, or charge the adult meal price and not claim the meal. Simply charging the paid student price but not claiming for reimbursement will likely not cover the entire cost of the meal.

#### **Field Trip Meals**

- The food service module in the previously existing district-wide software system was added for the current school year. For this reason, the point of service (POS) procedures for field trip meals are under revision by the SFA. When developing new field trip POS procedures, please ensure that counts used for reimbursement claims are based on an acceptable, accurate POS procedures. The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal.
- The POS process should involve a check-off sheet that the accompanying teacher can use to mark off students as they take their reimbursable meal. Completed check off sheets should be returned to food service and used for charging student accounts and claim submission. The [Field Trip meal resources](#) can be of assistance in the modification of field trip POS (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).
- Students must not be charged and have their meals counted for reimbursement before the meal is actually served. Charging students when the meals are picked up in the morning prior to the trip may result in required refunds to student accounts and overclaiming if the students choose not to take their meal, end up not going on the field trip, get sick prior to meal time, or other scenarios occur that prevent the student from taking and eating their reimbursable school meal.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Menus, OVS, and Crediting

#### Commendations:

- Thank you to the food service director (FSD) at Benton School District for the great organization of requested documentation. It is evident that the FSD cares about serving students in Benton School District appealing, tasty, and healthy meals. The FSD works hard to plan compliant menus with multiple options. Thank you to the food service staff for their warm welcome to Benton School District. All staff members were friendly and knowledgeable. The cafeteria was a friendly and inviting place for students to eat. Appropriate meal signage is hung with the daily menu. All meals observed on 12/19/2018 were reimbursable. Keep up the good work, Benton School District!

#### Technical Assistance:

##### Fruit and Vegetable Signage

- Since the garden bar is being used to meet meal pattern, signage should be used to assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) with pictures that can be posted on a salad or garden bar (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).
- An additional idea would be using dry-erase markers on the sneeze guard to write the appropriate serving size. Please note, this method is only effective for grade groups who can read at the height of the sneeze guard. When sliced fruit is offered, consider using signage to communicate with students how many pieces they need to select to create ½ cup.

##### Taco Meat on Production Records

- Please note that a serving of 3.17 oz of JTM Pork Taco Filling provides 2 oz eq M/MA. Per JTM information, this serving size fits in a #10 scoop. Production records show the planned portion size to be “2.45 oz or #10 scoop.” It was confirmed onsite with the FSD that a #10 scoop is always used when portioning JTM Pork Taco Filling. Please update production records to show the planned portion size to be “3.17 oz or #10 scoop.”

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

- ❑ **\*\*Finding D:** There was a missing vegetable subgroup when peas (starchy) were planned for 11/5/18, but taken off the menu and substituted with squash (red/orange). Thank you for documenting the substitution on the production record. Ideally, a substitution vegetable should credit comparably to the original planned item and belong to the same vegetable subgroup. Had ½ cup of peas been served the ½ cup weekly requirement for starchy vegetables would have been met. Since peas were not served, there were zero cups of starchy vegetable offered during the week of review.

**Corrective Action:** Submit a written statement agreeing that in the future vegetables will be substituted with a different vegetable from the same subgroup in order to meet weekly subgroup requirements.

- ❑ **Finding E:** Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. A few recipes used during the review week were not standardized to Benton School District:
  - Tuna salad
  - Breakfast fruit smoothie
  - Breakfast sandwich (alternately, list each item separately on production records [e.g. egg patty, muffin, cheese, sausage])

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

**Corrective Action:** Submit standardized recipes for the items listed above.

- ❑ **Finding F:** Production records are intended to be useful tools to record information prior to production, during production, and following production. The following information is not being thoroughly recorded:
- Actual quantity prepared (in purchase units) [breakfast]
  - Leftovers (breakfast)
  - Alternate meal options (lunch)
  - The number of each type/flavor of fruit/juice served daily was not recorded on the production record. The specific type(s) of fruit/juice offered, along with planned portion size(s) and planned number of portions, must be included to document this component was planned and served. (breakfast and lunch)

Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Continue to work with all staff members to record all portions of the production records.

**Corrective Action:** Submit one five-day week of correctly completed breakfast and lunch production records.

- ✓ **Finding G:** No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. Once fruit is pureed (as it is in a smoothie), it is considered fruit juice since it is consumed as a beverage. This limit applies separately to breakfast and lunch. It is possible to offer juice daily and meet the 50 percent juice limit if it is offered along with fruit (fresh, frozen, dried, or canned) in the equivalent amount. For example, ½ cup whole fruit can be offered alongside ½ cup 100% juice each day, and still meet the 50 percent limit.
- An 8 oz smoothie credits as 1 oz eq MMA and 1/2 cup fruit juice (so students offered the smoothie need access to ½ cup whole fruit)
  - If the daily 4 oz juice box is offered with the smoothies students have access to 1 cup juice (1/2 cup in the smoothie, ½ cup in the juice box) and ½ cup whole fruit.
  - Over the course of the week 5.5 cups of fruit are offered, but 3 of those cups are in the form of juice. This results in 54.55% of fruit being offered in the form of juice, which exceeds the 50 percent limit.

**Corrective Action:** The food service director re-arranged the menu so students who select a smoothie do not have access to a juice box. Alternately, it should be communicated with students via signage how many pieces of whole fruit they may select to meet the 50 percent limit on days that smoothies are offered *Corrected on site; no further action required.*

- ❑ **\*\*Finding H:** Weekly meat/meat alternate (M/MA) and grain shortages were noted. The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entrée option, each entrée option offered is viewed as one “line” and therefore needs to

meet the daily as well as the weekly requirements. While the following do meet daily requirement for the K-8 meal pattern, they do not provide the required 8 oz eq grain and 9 oz eq M/MA weekly:

- The alternate PBJ entree provides 1 oz eq M/MA daily, or 5 oz eq weekly
- The alternate meat and cheese wrap entree provides 1 oz eq grain daily, or 5 oz eq weekly
- The alternate yogurt, cheese, and graham cracker entree provides 1 oz eq grain daily, or 5 oz eq weekly

**Corrective Action:** Submit a [menu planning worksheet](#) for alternate entrees at K-8 lunch showing that all quantities will be met (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-8.doc>). Refer to the [Lunch Meal Pattern Table](#) for daily and weekly requirements (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>).

- ❑ **Finding I:** The weekly grain-based dessert limit was exceeded. The alternate yogurt, cheese, and graham cracker entree provides 1 oz eq grain daily. Graham crackers are allowed to be served at lunch, but count as a dessert. Since this entrée option is offered daily, students have access to 5 oz eq dessert per week at lunch. No more than 2 oz eq of grain-based desserts can be offered per week at lunch.

**Corrective Action:** Complete menu planning worksheet for yogurt, cheese, and grain alternate entrée (see CA for finding H) that shows 2 oz eq or less of grain-based dessert will be offered weekly. Submit crediting documentation and nutrition information for new/replacement items.

- ❑ **Finding J:** The printed menu should list all components included with the reimbursable meal.
- Occasionally, daily milk is cut off the daily options. To save space, milk may be listed in one place on the menu and a statement may be included that says that a variety of milk is offered daily as part of the reimbursable meal.
  - Alternate entrée options are not listed on the menu:
    - Ham or turkey with cheese on bun, bread, or wrap
    - PBJ sandwich
    - Yogurt, string cheese, and graham cracker
  - 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.

**Corrective Action:** Submit a copy of an updated menu with all offerings listed and the updated Non-Discrimination Statement.

*\*\*Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*

*Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the 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

##### Technical Assistance:

##### Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The [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>).
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other.” Only expenses for edible food items and beverages should be reported under “Food.”
  - “Equipment” should reflect major purchases of equipment costing over \$5000 per unit. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other.”
  - Under “Purchases Services” report any time someone is paid for services provided such as equipment repair and health inspections.
  - Under “nonprogram foods,” report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
- The AFR did not have revenues and expenditures properly allocated to non-program foods. Additionally, food costs for la carte snack items were improperly categorized as afterschool snack program food expenses on the AFR. See corrective action below.

##### Non-Profit Food Service Account

- The non-profit food service account was negative at the end of the school year 2017-18. Non-federal funds were properly transferred to Fund 50 to bring the balance up to \$0.00.

##### Increasing Participation to Increase Revenue

- The non-profit food service account is currently running in the negative, thus requiring an annual transfer from a non-federal funding source. Increasing program participation is one way to generate more revenue and work towards a positive fund balance for food service. Conducting a survey of the student body may be a good starting point for targeting changes that can be made to increase participation.
- Changes that may increase participation can vary significantly by student body and their preferences. What may be very successful in one district may not work as well in another district, which is why surveying the students in the SFA is recommended. However, there are a few broad ideas to consider when exploring changes to aid in increasing participation.
  - Run fun promotions in the cafeteria for different occasions. The [Team Nutrition webpage](https://dpi.wi.gov/team-nutrition) has ideas and resources for promoting the programs (<https://dpi.wi.gov/team-nutrition>).
  - Consider [alternative breakfast models](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) to increase breakfast participation (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>)
  - Explore options for some [scratch or “speed scratch” cooking](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>)

### Unpaid Meal Charge Policy

- The unpaid charge policy submitted as part of review materials lacked detail and specificity, particularly regarding the alternative meal procedure utilized in the SFA. During the on-site review, it was discussed that this policy is in the process of being revised. The draft of the revised policy shows improvements and more clearly communicates the district's procedures for managing negative account balances. It was also discussed that the board policy will contain general language regarding the permissible negative balance amount, and the policy printed in the student handbooks will specify the exact amount. This communication decision was put in place to make editing the permissible negative balance easier from year to year. Please continue modifying and improving the policy as needed to ensure the expectations and procedures for negative meal balances are clearly communicated to all district families.

### Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ✓ **Finding K:** The annual financial report did not have any revenues or expenditures allocated to non-program foods. Because non-program foods are offered in the district, revenues and expenses must be allocated to them on the report. Additionally, the expenditures allocated to the afterschool snack program warranted additional investigation and possible correction as they may have been misallocated.

**Corrective Action:** The bookkeeper corrected and submitted the annual financial report electronically. *No further action required.*

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### Revenue from Non-Program Foods

#### **Technical Assistance:**

#### Food Purchased for Other Organizations

- On occasion, the food service director will purchase food items for community organizations on their behalf. In these scenarios, the full cost of the food is recovered via check from the organization submitted to the school secretary. It is highly recommended to begin charging some type of service/labor fee for these food orders to ensure that the food service director's labor time spent preparing the orders is covered since these orders are for non-program purposes.

### Findings and Corrective Action Needed: Non-Program Foods revenue

- ❑ **Finding L:** The [Non-program Foods Revenue Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) has not been completed for the current school year to assess compliance with the revenue requirements (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

**Corrective Action:** Watch the [Nonprogram Foods Revenue Tool webinar](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html) ([https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html)). Submit a completed tool using at least a 5-day reference period. After tool completion and submission, the SFA and consultant must collaborate on any suggested changes to non-program food procedures and pricing to ensure compliance if the completed tool indicates non-compliance with requirements.

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## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

#### Technical Assistance:

##### Overt Identification

- While the meal charges for individual meals all showed up as “Lunch - 1” or “Breakfast - 1” on the cashier screen, total prices for the transaction showed up under “current purchases.” When a free eligible student came through the line, the current purchases total registered as \$0.00. For a reduced eligible student, current purchase total was \$0.40, and so on. This display of the current purchase total could constitute overt identification, even though prices by eligibility category did not show up for the meal itself. Please investigate and work towards removing the current purchases section from the cashier screen. The cashier does not need to know the total current purchase amount since cash is not accepted on the line and account balances are still visible for unpaid meal policy enforcement.

##### Civil Rights Compliance Self-Evaluation Form (PI-1441)

- The SFA did complete the PI-1441 prior to the review, however it was not completed by the October 31 deadline. Going forward, this evaluation form should be completed by October 31. This evaluation does not get submitted to DPI, but should be retained at the SFA for self-evaluation purposes and for future reviews.

##### Public Release

- The public release contains specific income amounts for free or reduced benefits, and thus cannot be sent to households and should not be posted on the district’s website. It is advised to remove the public release from the website.
- While Benton School District met the public release distribution requirements by sending the public release to at least one media outlet and grassroots organization, the SFA did not retain documentation that this distribution occurred. Annually, the SFA should retain documentation that indicates to whom the public release was sent and on what date. This could simply be in the form of an email communication between the appropriate school staff member and a representative from the media or grassroots organization. As a reminder, SFAs are required to send the public release to a media outlet (such as a local newspaper), but are not required to pay to have it published. Please begin retaining documentation regarding the distribution of the public release.

##### Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service of the state agency within 5 days. This should be included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\_combined\_6\_8\_12.pdf).
- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](https://fns-prod.azureedge.net/sites/default/files/113-1.pdf) resource (https://fns-prod.azureedge.net/sites/default/files/113-1.pdf).

### Special Dietary Needs

- While the SFA is not currently accommodating any special dietary needs, it is important to note and become familiar with the pertinent regulations for possible accommodations in the future.
- 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 or water may not be substituted for fluid milk unless juice or water is specified as a substitution on a medical statement signed by a licensed medical practitioner. An SFA may choose to offer lactose-free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA without a medical statement. 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>).
- 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>).

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### On-site Monitoring

#### **Technical Assistance:**

- While the SFA operates three school sites according to the online contract, all school sites are located in the same building. The food service director has direct daily oversight for all sites and therefore on-site monitoring is not required.

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### Local Wellness Policy (LWP)

#### **Technical Assistance:**

- The wellness policy submitted as part of review materials was outdated and lacked several of the required content areas. During the on-site review, it was discussed that this policy is in the process of being revised. The draft of the new wellness policy appears to be more detailed and comprehensive. However, the draft is still lacking a few content areas including public involvement,

the triennial assessment, and updating/informing the public. Please see the required content list below for details. Technical assistance was provided to the authorized representative to add these topics into the policy as the draft continues to be developed. As revision of the policy is already in the works and scheduled to be finalized in the late winter or spring, additional corrective action was not requested.

#### Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness policy (LWP) requirements. At a minimum the wellness policy must include:
  - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
  - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
  - Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
  - Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
  - Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
  - Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
  - Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
  - Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

#### Committee of Stakeholders

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.

- Currently, the SFA does not have an established committee of diverse stakeholders. Please work towards development of a committee as the policy continues to be updated and implemented in the district.

#### Triennial Assessment

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place.
- To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources).
- Additionally, the SFA is required to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

#### **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). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.

### Smart Snacks in Schools

#### **Technical Assistance:**

##### A la Carte Menu

- Please specify which a la carte items are only available for purchase by staff versus those available for purchase by staff and students.

##### Fruit

- The FSD stated that students who select a reimbursable meal can take as much fruits and vegetables as they would like (within reason). Currently, fruit is listed for sale on the a la carte menu. Please communicate that fruit is available for purchase for those individuals who do not wish to purchase a reimbursable meal.

#### **Findings and Corrective Action Needed: Smart Snacks**

- ❑ **Finding M:** Snack items may not exceed 200 mg sodium per serving. A 1 ounce package of Golden Grahams contains 220 mg sodium. This product is not Smart Snack compliant.

**Corrective Action:** Submit a written plan of action explaining what will be done to bring all offerings into compliance. If replacement items are selected, submit nutrition information and Smart Snack Compliance results for each new item.

- ❑ **Finding N:** Currently, student organizations are selling non-compliant food to students during the school day, and are not abiding by the two-week limit per the state-defined rules. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length. **The following are non-compliant because they exceed two consecutive weeks in length:**
- Rub Goldberg club sold cookies on November, 6, 13, 20, and 27
  - The Junior Class Prom sold Culver's Custard after lunch on November 2, 9, 16, 23, and 30 at the Middle and High School and on November 9 and 30 at the Elementary School.
  - The Sophomore Class is selling Culver's Custard on April 5, 12, and 26

These non-compliant products need to either follow the fundraiser **two-week limit** per student organization, per school, per school year, or be discontinued. Please note there *are* Smart Snack-compliant products that schools sell – perhaps a viable solution if this is to continue.

**Corrective Action:** Please address how planned food and beverage sales not meeting Smart Snack standards will be made to comply with these regulations. Use the [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) to review the guidelines (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf).

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## **Professional Standards**

### **Commendations:**

- The district provides ample opportunities for professional development and training, which is excellent. The food service director was keen to share some experiences from trainings attended in the last several years and was appreciative of the opportunities to attend such trainings. Keep up the great work providing opportunities for trainings and continuing to learn and develop skills relevant to school nutrition!

### **Findings and Corrective Action Needed: Professional Standards**

- ❑ **Finding O:** The determining and verifying official/bookkeeper/claim preparer has not completed and tracked the necessary four hours of professional standards training. This staff member's regular duties in the school nutrition programs classify them as a Category 2 staff member for professional standards purpose. See the [Professional Standards Training Requirements chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) for details (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf).

**Corrective Action:** Create a professional standards tracking tool for this staff member that contains the person's name, date of hire, designation as part-time for school nutrition purpose, reporting period (school year 2018-19), and any trainings completed so far in the current school year. It is recommended to use the [DPI tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx), although not required (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx). Please note that training hours can include, but are not limited to:

- Annual civil rights training
  - Time spent preparing for and collaborating with DPI for the administrative review
  - Webinars/webcasts on school nutrition topics
  - Software trainings related to school nutrition program management
  - Business trainings that pertain to Fund 50 management
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## Food Safety

### **Commendations:**

- The food service director took great care and had a deep interest in developing and implementing the food safety plan. It was clear through observation that food safety is a priority, as well as development of specific standard operating procedures.

### **Technical Assistance:**

#### Food Safety Plans

- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria including on field trips.
  - It is encouraged that the food service director continue modifying and updating the SOPs in the food safety plan as processes change and as the SOPs can be made more specific to actual practices occurring in the operation.
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## Buy American

### **Technical Assistance:**

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. The Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.
- 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. More information on this new requirement, including a tool to assist with tracking noncompliance 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>).
- When completing the Buy American Non-Compliant Product list there are 4 pieces of information that must be recorded:
  1. Date
  2. Name of product
  3. Country of origin
  4. Reason
    - a) **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
      - *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
    - b) **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
      - *Ex. Blueberries are not available domestically during the months of December – June.*
    - c) **Availability** – Product(s) is not available to purchase domestically.
      - *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*



- d) **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
  - *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
- e) **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
  - *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
- f) **Other**- Please provide a written explanation.
  - *Ex. The SFA received a donation of non-domestic oranges*
  - *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*
- Additional information may be recorded if it will be beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american>). For more information on Buy American exceptions, visit the [Buy American Provision Memos](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos>).

#### **Findings and Corrective Action Needed: Buy American**

- ❑ **Finding P:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:
  - Pineapple- Philippines
  - Garlic powder- USA and China

**Corrective Action:** Complete and submit a non-compliant product list/form for these items. Please be sure to include the four key pieces of information described above in the “technical assistance” section (date, name of product, country of origin, and reason for non-compliance).

*Note:* In reference to the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

### **Summer Food Service Program (SFSP) Outreach**

#### **Technical Assistance:**

##### **Summer Meals**

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Benton School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months, per 7 CFR 210.12 and 210.18.
- SFAs can inform families of summer meals via the following methods:
  - Promotion of the [summer meals locator](#) 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 the 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](mailto:amy.kolano@dpi.wi.gov)

**Findings and Corrective Action Needed: SFSP Outreach**

- ❑ **Finding Q:** The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP), as required per 7 CFR 210.12 and 210.18.

**Corrective Action:** Submit a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please be specific and include details regarding the method of communication and timeframe for distributing SFSP outreach materials.

**Afterschool Snack Program (ASP)**

**Commendations:**

- The coordinator of the afterschool BACPAC program was very dedicated to caring for the participating children and put forth significant effort to provide the children with a variety of snack options to accommodate different preferences.

**Technical Assistance:**

**Child and Adult Care Food Program (CACFP) Meal Pattern**

- The BACPAC program serves morning pre-K students and elementary students. The pre-K students may attend BACPAC after their morning school session ends, as this is essentially a wraparound program. Pre-K students attending BACPAC in the afternoon have access to breakfast, lunch, and afterschool snack.
- For several hours in the afternoon, only pre-K students are at BACPAC because the rest of the elementary school is still in session. Snacks served to these pre-K students after the end of their morning school session may be claimed for reimbursement under ASP since the snacks are served after the end of the pre-K instructional day. The pre-K BACPAC students present in the afternoon are allowed to take a reimbursable snack mid-afternoon. At this time, co-mingling does not occur with other grades/ages and therefore [CACFP meal pattern](https://www.fns.usda.gov/sites/default/files/cacfp/CACFP_childmealpattern.pdf) must be followed for these students at this time ([https://www.fns.usda.gov/sites/default/files/cacfp/CACFP\\_childmealpattern.pdf](https://www.fns.usda.gov/sites/default/files/cacfp/CACFP_childmealpattern.pdf)).
- After the end of the elementary school day, the BACPAC program serves a range of grades/ages. In the late afternoon and into the evening, the pre-K students are co-mingled with the other students, therefore CACFP meal pattern does not need to be followed at this time. The meal pattern for afterschool snack under the National School Lunch Program (NSLP) can be followed for all students at this time.
- Some of the most notable CACFP meal pattern differences are:
  - Flavored milk may not be served
  - Fruits and vegetables are considered separate components for snack
  - Yogurt may not contain more than 23 grams of total sugar per 6 oz.
  - Grain-based desserts may not be served

- Please visit the [Infants and Preschool in NSLP and SBP webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) for a variety of resources pertaining to the CACFP meal pattern (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Resources about [grain-based desserts](https://fns-prod.azureedge.net/sites/default/files/tn/CACFPGrainBasedDesserts.pdf) and [yogurt sugar limits](https://fns-prod.azureedge.net/sites/default/files/tn/cacfp-chooseyogurts.pdf) are included on this webpage (<https://fns-prod.azureedge.net/sites/default/files/tn/CACFPGrainBasedDesserts.pdf>; <https://fns-prod.azureedge.net/sites/default/files/tn/cacfp-chooseyogurts.pdf>).

### Menu Planning

- The afterschool snack meal pattern requires that at least two of the four (or five components under CACFP) be served daily. Students must select full servings of items from two different component groups for the snack to be considered reimbursable. It is not required to offer all four (or five) components daily. For example, a snack menu simply offering a one ounce string cheese and  $\frac{3}{4}$  cup of oranges on a given day would meet meal pattern requirements. In this example, students would need to take the string cheese and full  $\frac{3}{4}$  cup of oranges for the snack to be reimbursable.
- The program coordinator currently offers multiple snack choices in all component groups daily. While it is commendable that the coordinator offers a wide variety of snack options daily, all components do not need to be offered daily and multiple choices are not required within each component. During snack observation, the variety of snack choices seemed difficult to manage. It is recommended to revise the snack menu to reduce the number of daily snack choices available to students and streamline the snack selection process. Cutting back on the number of items offered daily would also make production record completion simpler.

### Point of Service (POS)

- Counts used for reimbursement claims must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal. During program observation, the program coordinator was not consistently checking off students as they took their reimbursable snacks. While the coordinator was watching to make sure every participating student took two full components in appropriate serving sizes, many students were not checked off on the POS sheet until later in the program, sometimes after the snacks had been eaten and the children had moved on to different activities. While the final counts on the day of review appeared accurate, the POS process requires revision to ensure consistent accuracy. See corrective action below.
- The communication between the program coordinator and the claim preparer results in an adequate transfer of snack counts and prevents overt identification. Additionally, the POS procedures adequately prevent claiming more than one snack per eligible student, including in cases when pre-K students may have the option to take two snacks throughout their time at BACPAC.

### Production Records

- Daily, completed production records are required for ASP to demonstrate compliance with meal pattern requirements. Production records must be retained for three years plus the current school year.
- Please reference the [Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) resource (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). Production records for ASP must contain:
  - Menu items
  - Food used
  - Serving size
  - Amounts used (of each item)
  - Number of children served
  - Number of adults served (which must NOT be claimed for reimbursement)

- While the program coordinator was keeping production records for the ASP, the records were not fully completed according to the production record requirements. Most notably, the amount of each snack item served daily was not noted—only the total number of reimbursable snacks served was recorded. There are two [production record templates](#) that could be used in ASP which can be found on the Afterschool Snack webpage (<https://dpi.wi.gov/school-nutrition/after-school>). The template called “[Production Record with Sample](#)” may be the easiest template to use for Benton’s ASP ([https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/assnacks\\_prorec\\_13.doc](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/assnacks_prorec_13.doc)). See corrective action below.

### Grains

- Grains served as components of the ASP must be either whole-grain rich or enriched items. For ages children ages 6-12, at least 1 oz equivalent (eq) of grains must be served to credit as a full snack component. To determine if a grain item is a 1 oz eq serving, [Exhibit A](#) can be used or a product formulation statement (PFS) can be obtained from the product manufacturer (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>).
- The program coordinator serves a variety of whole-grain rich items, however documentation was not available to support that each packaged item was a 1 oz eq of grain. The coordinator had been using the product weight on the individual item packages to determine if the item weighed at least 1 oz. However because these food items have multiple ingredients, a total weight of 1 oz does not necessarily mean that the product counts as a 1 oz eq of grains.
- As part of the review, the program coordinator is now collaborating with the food service director to obtain a PFS for each item to ensure the serving sizes are appropriate. At the end of the on-site review, the only PFS that had yet to be obtained was for the Chewy granola bars, which has since been requested from the manufacturer.

### Juice

- For full-strength 100% juice to credit as a snack component for child ages 6-12, at least ¾ cup of juice must be served. Allowing students to take two of the 4 oz juices to meet the ¾ cup minimum serving size requirement is acceptable. However, it may be worth investigating if a larger 6 fl oz (¾ cup) juice is available from the food distributor. Serving a larger juice box would eliminate the need to allow students to take two juices since the single, larger juice would meet the minimum serving size on its own.

### **Findings and Corrective Action Needed: Afterschool Snack Program**

- ❑ **Finding R:** The classroom where afterschool snack is served does not have an *And Justice for All* poster displayed.

**Corrective Action:** Obtain an updated poster (the newest posters are green) and display in a prominent location in the classroom. Please be sure that the poster is displayed at a height-appropriate level so the smaller children can view the poster if desired. Send a photo of the poster when it is displayed. To order a poster, email [dpifns@dpi.wi.gov](mailto:dpifns@dpi.wi.gov) or call 608-267-9228.

- ❑ **Finding S:** The point of service (POS) used for counting snacks served does not meet requirements. Students are not consistently checked off the roster at the time they select their reimbursable snack. During observation, the coordinator checked off many students later in the program after their snacks were consumed, thus relying on memory of who took a snack. While the final counts on the day of review appeared accurate when compared to the state agency reviewer’s counts, the POS process requires revision to ensure consistent accuracy. Students must be checked off the POS sheet at the time it is determined that the eligible child received their reimbursable snack.

**Corrective Action:** Develop a modified procedure for the POS at snack. Submit a written statement describing how the coordinator will check off students going forward to ensure counts are consistently

accurate. If the check off sheet will be modified in any way, please send a copy of the updated check off sheet with the written statement.

- ❑ **Finding T:** CACFP meal pattern is not being followed for the mid-afternoon snack (which is claimed under ASP) for the pre-K students, and co-mingling does not occur at this time. See technical assistance above.

**Corrective Action:** Modify the snack menu served in the mid-afternoon to the pre-K students only to be compliant with the CACFP meal pattern. Submit the modified menu to the consultant.

- ❑ **Finding U:** Production records were kept for the ASP, however they were not completed fully in accordance with ASP production record requirements. Specifically, the amounts of each snack item served were not noted. For example, the total number of reimbursable snacks served daily was recorded but it was not noted how many milks, string cheeses, graham crackers, etc. were served to make up the total number of reimbursable snacks served.

**Corrective Action:** Modify the production records so that all required information is recorded daily. Send the consultant one week (5 school days) of completed production records after the modifications have been made. See technical assistance above for links to production record templates and a list of requirements.

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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](https://dpi.wi.gov/statesupt/every-child-graduate) (<https://dpi.wi.gov/statesupt/every-child-graduate>).

