

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

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**School Food Authority: Antigo Unified School District      Agency Code: 34-0140**  
**School(s) Reviewed: West Elementary, East Elementary, North Elementary FFVP only**  
**Review Date(s): 3/18-20/19      Date of Exit Conference: 3/20/19**

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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:

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](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, and 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).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Antigo Unified School District for the courtesies extended to us 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 with immediate attention to corrective action! In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

**REVIEW AREAS**

**1. MEAL ACCESS AND REIMBURSEMENT**

**Certification and Benefit Issuance**

### Commendations/Comments/Technical Assistance/Compliance Reminders

- Of the 1,316 students eligible for free or reduced price meals in February, a sample of 450 students was pulled for review, and all but 1 was approved correctly.

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

- ❑ **Finding #1:** From the student sample reviewed for benefit's issuance, 1 student is receiving free benefit via income application but should be receiving reduced benefit.  
**Corrective Action Needed:** Please notify this household of the reduction in benefits (to take effect 10 days from the date, they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action.
- ❑ **Finding #2:** The Benefit's Issuance document did not have the Direct Certification approval date of the benefits issuance listed.  
**Corrective Action Needed:** Please submit a statement of understanding that the BI list will contain the date the student was approved for benefits.

### Verification

### Commendations/Comments/Technical Assistance/Compliance Reminders

- The sample verified from the sample pool must always be rounded up to the nearest whole number.

### Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** The application pool was 107 and 3% standard sample equals 3.21 or 4 applications to verify, as it must round up. The SFA only verified 3 applications.  
**Corrective Action Needed:** Please provide a statement that going forward, the correct sample will be verified.

### Meal Counting and Claiming

### Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.

### Findings and Corrective Action Needed: Meal Counting and Claiming

- ✓ **Finding #1:** The Point of Service (POS) is where the reimbursable meal is determined, so if the server is the POS, they need to be at the end of the line and the server is at the beginning of the line.  
**Corrective Action Needed:** Please have the server move to the end of the line to accurately determine if a reimbursable meal has been taken. **Completed on site, no further action required.**
- ✓ **Finding #2:** Students that come late at West Elementary are given breakfast and go to the office to punch in their pin number into the POS and the meal should be charged to the student at the time of service.  
**Corrective Action Needed:** Please develop a plan to have late students charged for their meals in the cafeteria. **Completed on site, no further action required.**

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

**Commendations:** Thank you to the staff of Antigo Unified School District for their warm welcome, cooperation, and time during the Administrative Review. A special thanks to the Food Service Director for providing documentation prior to the on-site review. The Food Service Director is knowledgeable and continues to find more opportunities to increase program participation, produce exciting meals for students, and improve the programs. The school nutrition professionals are friendly, hardworking, and have great rapport with the students.

The Child and Adult Care Food Program meal pattern is being properly implemented for 4K students at East Elementary. At East and West Elementary, a good practice was observed of having condiments be pre-portioned for students. At West Elementary, 5<sup>th</sup> grade students assisted with serving lunch, which was another great practice that was observed. Students were excited to receive lunch from their friends and the students that were serving took pride in their work.

We enjoyed our time at Antigo Unified School District. Thank you for your hard work and dedication to your School Nutrition Programs!

### **Technical Assistance:**

*Production Records: Planned Number of Servings Prepared*

[Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) are met except for planned number of servings prepared (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). The planned number of servings prepared column was changed to time sent/temp on the template used. There are templates that include all requirements and a temperature column on the [Production Record](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

*Production Records: Milk Usage*

While there is a milk recipe for breakfast and lunch at West Elementary and lunch at East Elementary, it is required that milk usage is recorded on production records. Because there is a milk recipe, total milk usage can be recorded, instead of recording usage by each type of milk.

*Vegetable Juice*

All vegetable subgroups were met for the week of review. On production records, it was noted that the Fruitables juices credit as other vegetable. The Gold Rush juice credits as red/orange vegetable because all of the ingredients are red/orange vegetables. The Power Punch juice credits as additional vegetable because the first ingredient is vegetable juice, but there is also fruit juice in the product. Therefore, it would credit towards the daily/weekly vegetable requirements but not a subgroup.

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

❑ **Finding #1:** Documentation provided for the week of review demonstrated a weekly grain shortage at breakfast at West Elementary. 6.50 ounce equivalent (oz eq) grain was the minimum amount offered. The K-5 weekly grain requirement at breakfast is 7.00 oz eq. The planned menu indicated 7.50 oz eq grain would be offered. However, on Thursday and Friday cereal (1.00 oz eq) was substituted. On Thursday, the substitution was not equivalent to the planned entrée.

**Corrective Action Needed:** Submit a statement indicating how the K-5 breakfast 7.00 oz eq weekly grain requirement will be met during the week of review, and explain how substitutions

will be handled during future service weeks. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

**Finding #2:** Breakfast and lunch signage was not posted prior to breakfast and lunch service at West Elementary. The school nutrition professional had signage available but did not post it because the students erase the writing. It was explained that signage is required for both breakfast and lunch.

**Corrective Action Needed:** Breakfast and lunch signage was filled in and posted prior to breakfast and lunch service. **No further action is required.**

**Finding #3:** Two non-reimbursable meals were observed during lunch service at West Elementary. The two meals did not contain 1/2 cup fruit, vegetable, or combination. While the school nutrition professional was replenishing one of the vegetable options for the day, she asked that the students wait for her to come back so she could serve them the vegetable. The students walked away from the service line, and the school nutrition professional who is the point of service, without 1/2 cup fruit, vegetable or combination.

**Corrective Action Needed:** Submit a statement indicating how this error will be corrected and avoided in the future.

**Finding #4:** Prior to lunch service at East Elementary, milk types were discussed with the Food Service Director and school nutrition professional. It was reported that 4K students receiving the CACFP meal pattern were able to deny milk. Offer versus Serve is not allowable under the CACFP meal pattern for these students, therefore, 4K students must be served all components.

**Corrective Action Needed:** This practice was corrected during meal service and all 4K students selected milk. **No further action is required.**

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### Commendations/Comments/Technical Assistance/Compliance Reminders

##### Annual Financial Report (AFR):

- All revenues and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

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

**Finding #1:** The district has cash in excess of 3 months operating expenses which constitutes an Excess Cash Balance.

**Corrective Action Needed:** Provide a spend-down plan as to how you will become compliant with USDA excess cash balances.

#### Revenue from Nonprogram Foods

##### Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.

- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

- ✓ **Finding #1:** The nonprogram food revenue tool submitted showed that the SFA is not meeting the required revenue ratio for nonprogram foods.  
**Corrective Action Needed:** Please submit a plan as to how the SFA will become compliant with the required nonprogram food revenue ratio. **Completed onsite no further action required.**

#### **4. GENERAL PROGRAM COMPLIANCE**

##### **Civil Rights**

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

##### **Nondiscrimination Statement**

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 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, the abbreviated statement may be used, "This institution is an equal opportunity provider." Both statements should be in the same size font as the other text in the document.

##### **Processes for complaints**

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

#### **Findings and Corrective Action Needed: Civil Rights**

- ✓ **Finding #1:** The USDA nondiscrimination statement on the Direct Certification letter has been altered and USDA nondiscrimination statement may not be altered in any way.  
**Corrective Action Needed:** Please update the nondiscrimination statement on your benefits determination letters and submit a copy as corrective action. **Completed on site.**

##### **Local Wellness Policy**

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

## 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 (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize 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>). 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).
- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies ([http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)). Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

## **Findings and Corrective Action Needed: Wellness Policy**

- **Finding #1:** SFA LWP meets some but not all requirements as stipulated above. The policy does not address marketing of food and beverages in the district. Please include information regarding marketing only Smart Snacks compliant products.  
**Corrective Action Required:** Please provide a timeline for updating the above items in your policy to become compliant with the final rule.

## Smart Snacks in Schools

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

□ **Finding #1:** West Elementary has one student organization that has two exempt fundraisers during the school day. Wisconsin allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. All fundraisers are required to be documented. Templates, such as the Exempt Fundraisers Tracking Tool, are available on the DPI SNT [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

**Corrective Action Needed:** Submit a statement indicating what position at West Elementary will be in charge of keeping track of fundraisers and how they will be tracked.

## Professional Standards

### Commendations/Comments/Technical Assistance/Compliance Reminders

- All training is being tracked on a tracking tool and all employees are on target to meet the required number of continuing training hours.

## Food Safety, Storage and Buy American

### Commendations/Comments/Technical Assistance/Compliance Reminders

#### Food Safety

- Food Safety Plan contains all of the required elements.

#### Food Safety Inspections

- Most recent Food Safety Inspections must be posted in publically visible location.

#### Time as Public Health Control

- When using "Time as a Public Health Control:"
  - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
  - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
  - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration or heat during service, including TCS foods on garden bars, all leftover TCS food must be discarded.
    - Because milk is held outside of mechanical refrigeration, at East Elementary School, this plan must be followed and all milk must be discarded at the end of service causing a great deal of unnecessary waste. If the milk was served directly out of the mechanical milk cooler, in the hall, this plan would not be required and milk would not need to go to waste.

### Findings and Corrective Action: Food Safety

- ✓ **Finding #1:** Most recent food safety inspection not posted in a publically visible location at East.  
**Corrective Action Needed:** Please post the most recent food safety inspection in a publically visible location outside of the kitchen. **Completed on site, no further action required.**

## Buy American

### **Technical Assistance:**

#### *Achieving Buy American Compliance*

Products that do not identify the country of origin require certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products. Labels should indicate if a product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that a product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification.

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

❑ **Finding #1:** Frozen broccoli was identified in East Elementary's storage area as a non-domestic food from Mexico. Antigo Unified School District does not have a Buy American Non-compliant List form or SFA equivalent for this product. A [template form](#) is located on the DPI SNT Buy American Provision webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

**Corrective Action Needed:** Begin using Non-compliant Product List forms or SFA equivalent for tracking non-domestic products. Provide a copy of the completed form for frozen broccoli as corrective action for East and West Elementary.

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

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

#### **Summer Meals**

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. 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](#) website (<http://www.fns.usda.gov/summerfoodrocks>)

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

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

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

- Per the Agreement in the points, the SFA agrees to, number 3 states schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid.
- Wisconsin School Day Milk Program is operated perfectly!
- The school may wish to consider having all milk breaks in the afternoon, as having them in the morning, often very close to lunch service, may decrease a student's appetite for meal service.

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

## Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you to Antigo Unified School District for participating in the Fresh Fruit and Vegetable Program (FFVP)! A special thanks to the Food Service Director for providing documentation and answering questions for the claim validation. The claim validation did not result in any findings. Excellent work!
- *Budgeting* - North Elementary is going to run out of funding in March. Different budgeting strategies, such as number of service days, type of produce purchased, and labor were discussed for budgeting, allowing the program to run the entirety of the school year.
- North Elementary serves three times per week. FFVP is required to be served a minimum of two times per full school week. If there is a shortened school week, FFVP should be served, but the two service day minimum is not required to be met.

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

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

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