

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

School Food Authority: White Lake School District

Review Date(s): December 17-18, 2018

School(s) Reviewed: White Lake High School

Date of Exit Conference: December 18, 2018

Agency Code: 346440

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at White Lake School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were 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. White Lake School District's food service director and staff do an amazing job with maintaining and organizing documentation. Everything the reviewers needed was readily available and staff were eager to learn.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

White Lake is CEP SFA-wide, and therefore, the verification process is not required. While the distribution and collection of free and reduced applications is not required, the need for individual student income level information may still be necessary for other programs (e.g. Title 1, SAGE, and WSDMP). The SFA may utilize DPI Alternative Household Income Forms, as it is CEP SFA-wide. Student eligibility information is also required and maintained on site at the SFA for all students as this information is needed for reporting purposes.

Meal Counting and Claiming

Commendations:

The counting system at White Lake produces accurate counts and does not allow for second meals to be counted or claimed. Additionally, the CEP claiming percentage matched the SFAs online contract and monthly claims. The review period's daily counts for both NSLP and SBP were appropriate and accurately transferred to the monthly claims. Great work!

Technical Assistance:

- If a non-CEP *school-aged* student eats at a CEP school, whether or not the student is within the same district, the CEP school will not take payment from the student. The student's meal is included in the total count at the CEP school and the school is reimbursed by DPI according to the claiming percentages.
- The SFA has an alternate serving agreement at the high school where meals are counted at the beginning of the line and identified as reimbursable at the end of the line. This information needs to be reflected in the SFAs online contract.

Compliance Reminders:

- For CEP sites, a claiming percentage for the free and paid meals is established and applied to both the SBP and NSLP Claims for Reimbursement equally. Meals must be counted separately prior to applying the free and paid claiming percentages to generate monthly claims at CEP sites.
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2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of White Lake School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. The Food Service Director is eager to learn. She asks questions reflective of her desire to comply with regulations and to improve the child nutrition programs at White Lake School District. She is also resilient, accepting constructive criticism and praise.

Technical Assistance and Program Requirement Reminders

Non-Reimbursable Meals

One student at White Lake High School selected a non-reimbursable meal during breakfast meal observation on Tuesday, December 18. The student selected a bagel (2 ounce equivalents [oz eq]) and a juice box (6.75 fluid ounces), which was fewer than three items. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

USDA Food Buying Guide for Child Nutrition Programs

The [USDA Food Buying Guide for Child Nutrition Programs](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, meat/meat alternates (m/ma), and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on “food items search” and type in a specific food in the “keywords” search box. Many different options may appear. Find the entry that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.

A webinar presented by USDA Child Nutrition Programs Nutrition & Technical Assistance Branch showcased the new FBG Mobile App and FBG Interactive Web Tool via a demonstration. Learn how to utilize the innovative features of these tools including search and navigation, the ability to compare food yield information, and the ability to create a favorite foods list. Access the [recorded webinar](https://youtu.be/UP_t3D7AYAM) (https://youtu.be/UP_t3D7AYAM) on the [Food Buying Guide Goes Digital! webpage](https://www.fns.usda.gov/tn/food-buying-guide-goes-digital) of the USDA Food and Nutrition Service website (<https://www.fns.usda.gov/tn/food-buying-guide-goes-digital>).

Most fruits and vegetables credit by volume served (e.g. 1/2 cup peaches, drained will credit 1/2 cup fruit) and the FBG will note if the crediting is different based on volume served (e.g. one medium banana credits 1/2 cup fruit). Reference the School Nutrition Team (SNT) [Half-Cup Crediting of Fruits and Vegetables Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) for amounts required to credit as 1/2 cup as well as suggested serving sizes (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>). If the product is not listed in the FBG, additional crediting documentation is required.

In-House Yield

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the school food authority’s next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG. [Specific and verifiable procedures](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf>), which must be followed, are available on the [Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

Crediting Documentation

Processed foods that are not listed in the FBG must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. Secure a PFS directly from the manufacturer or save a CN label directly off the packaging.

Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. The SNT recommends maintaining and organizing this information in a manner that is easy to reference and update, such as a binder, file folders divided into categories, or organized as digital files. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

State-Processed and USDA Foods Product Information Sheets

Product formulations change frequently, therefore it is important that nutrition facts labels, CN labels, USDA Foods Product Information Sheets (USDA Fact Sheets), and PFS on file are kept up-to-date. State-Processed Product Information is updated annually and can be found:

[SY 2018-19 State-Processed Product Nutrition Information](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf)

[USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) are organized by component and updated as needed (https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets). CN labels can be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed.

More information about crediting documentation can be found on the [NSLP Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs), under the Child Nutrition Labels and Product Formulation Statements heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

Fruit Cups

According to guidance from the USDA Midwest Regional Office, manufacturers are allowed to declare volume measurements contained in fruit cups as a means of crediting information (i.e. 3/8 cup of mandarin oranges and 1/8 cup of 100% fruit juice). Additional documentation must be provided. Manufacturers are also allowed to provide in-house yield data. School food authorities shall measure the contents of fruit cups to ensure they obtain the same volume measurements declared by the manufacturers. Reference the [Tips for Accepting Processed Product Documentation PDF](#) on the Menu Planning webpage for steps to verifying the accuracy of information on a PFS (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/tipsheet_processedproduct.pdf).

Exhibit A

[Exhibit A](#) is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1.0 oz eq for each specific group (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf). Exhibit A groups all grain products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:

- Group A: these products are hard and crunchy, dry and lightweight. Per ounce, they contain a good deal of grain.
- Group B: whether serving bagels, pizza crusts or tortillas, 1.0 ounce of these products all credit the same towards the meal pattern (1.0 ounce by weight = 1.0 oz eq grain).
- Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1.0 ounce of pancake does not credit as 1.0 oz eq like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz eq grain.

Exhibit A can be used to credit any of the products that appear in the table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

Whole Grain-Rich Requirement

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. The following grain products are not WGR: Apple Whirls (8529745), Cocoa Munchees (6981377), Fruit Whirls Ring Shape (6768436), Bunch O's Krunch (6799167), Frosted Flakes (6781587), Bread Pullman Wheat .5" Sliced (2473292), Dough Roll Cinnamon Sweet (SUPC: 1028521), and Bread Crumbs Plain Medium (6885422). USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

The terms "wheat" or "made with whole grains" on a product label do not necessarily mean that a product is WGR. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole. Alternatively, crediting documentation in the form of a PFS may

show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients.

Standardized Recipes

A standardized recipe is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time, when the exact procedures, equipment, and ingredients are used. Recipes must be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen.

Use the resources on the [Standardized Recipes webpage](#), including a checklist for pieces of information needed to standardize a recipe; tools to help analyze the meal component contribution; nutrient analysis tools; and [templates to organize all information once obtained](#) (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>). The PHN also encourages viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>). Recipes for salad bar lettuce, chicken/broccoli/rice bake, chili, turkey and gravy, egg bake frittata, and smoothies are not standardized to the operation.

School Breakfast Program (SBP)

An item at breakfast is defined as 1.0 oz eq grain, 1.0 oz eq m/ma, 1/2 cup of fruit and/or vegetable, or 1 cup of milk. Under OVS at breakfast, four food items must be offered, and students must select at least three food items, one of which is ½ cup fruit and/or vegetable to have a reimbursable meal. Students at White Lake High School are offered six or more food items each day. Some of these items are portioned inconsistently with the definition of an item (e.g. 3/4 cup of juice, two strawberry cups [1 cup], two applesauce cups [1 cup], 3/4 cup of grapes, etc.); therefore, they contribute towards the dietary specifications without counting as multiple food items. Consider portioning consistent with the definition of an item (e.g. 1/2 cup of juice, one strawberry cup [1/2 cup], one applesauce cup [1/2 cup], 1/2 cup of grapes, etc.)

While not enforced at this time, the weekly maximum for grains at breakfast was exceeded by 12.75 oz eq. Staying within range of the dietary specifications while exceeding the weekly maximums poses a significant challenge. Consider a choice of breakfast entrée (e.g. breakfast pizza or cereal and yogurt; Trix cereal bar or cereal and string cheese; etc.) rather than allowing students to take all food items offered for breakfast. As a reminder, no more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. It is possible to offer juice daily and still meet the 50 percent juice limit as long as it is offered along with fruit (fresh, frozen, dried, or canned). Use caution when determining if students can select duplicate juice cups with meals. SP 10-2012, Questions and Answers on the Final Rule defines an “offering” of fruits or vegetables for the purposes of assessing the juice limit, as “the amount a child is able to select at a given meal, regardless of the number of options/variety of fruits or vegetables. The total amount of juice available at all meals over the course of the week (separately for lunch and breakfast) is then divided by this total fruit offering to determine the weekly juice offering. No more than half of the total fruit offering may be in the form of juice.”

Weight versus Volume

	Measures	Measured In	Conversions	Tools Used
WEIGHT	Meat/meat alternates Grains	Ounces (oz) Grams (g) Kilograms (kg) Pounds (lb or #)	1 lb = 16 oz 1 oz = 28 g	Scale
VOLUME	Fruits Vegetables	Fluid ounces (fl oz)	3 tsp = 1 TBSP 16 TBSP = 1 c	Spoodles , measuring cups, measuring spoons, scoops, dishers, ladles

	Milk	Tablespoon (T or TBSP) Teaspoon (t or tsp) Cups (c) Pint (pt) Quart (qt) Gallon (gal) Liter (L)	1 c = 8 fl oz 1 pint = 2 c 1 quart = 2 pints 1 gallon = 4 quarts	
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Please note, weight and volume are neither equal nor interchangeable. Ounces by weight do not equal fluid ounces.

Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Technical assistance was given on using volume measures (such as cups) to record portion sizes of fruits and vegetables, and using weight measures (such as ounces) to record portion sizes of m/ma and grains.

Sodium

In November 2017 an interim final rule was published that continues the Sodium Target 1 through the school year (SY) 2018-19. USDA recognizes that even though great progress has been made, schools and industry expressed the need for additional time and assistance to effectively achieve changes in the school meal patterns, including those related to sodium. At the same time, the WI DPI encourages schools to “keep in mind the best interests of the students and provide our school children with the most healthful and nutritious meals possible.” Products that can be major contributors of sodium include condiments, regular canned vegetables, regular canned soups, dairy products, and processed food items.

Vegetable Subgroups

The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students are getting a variety of nutrients each week, the USDA lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Beans and peas (legumes) are excellent sources of dietary fiber and nutrients such as folate and potassium. Some foods commonly referred to as beans and peas, such as green peas, lima beans, and green beans, are not considered part of this vegetable subgroup because their nutrient profile is not like those of legumes. During the review period, the beans/peas vegetable subgroup minimum weekly requirement of 1/2 cup was not met. Consider serving baked beans or refried beans from the steamtable or garbanzo beans or black beans from the garden bar, or increasing the volume of kidney beans in the chili recipe.

Addressing Hunger

According to [The School Day Just Got Healthier Fact Sheet: Calories in School Meals](https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf), there are no specific maximums for fruits or vegetables (https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf). Schools may allow greater amounts than the required minimums by offering self-service or allowing seconds servings of fruits and vegetables. Additional offerings do count towards the weekly calories limits, but because fruits and vegetables are generally lower in calories, they can be excellent sources for satisfying meals and sustaining energy. USDA policy memorandum [SP 41-2014](https://fns-prod.azureedge.net/sites/default/files/cn/SP41-2014os.pdf) also states that with time-limited lunch periods and increased amount of fruits and vegetables offered as part of the meals, some students may be inclined to save some items for consumption at a later time (https://fns-prod.azureedge.net/sites/default/files/cn/SP41-2014os.pdf). There is no federal prohibition of this practice, and Food and Nutrition Services (FNS) encourages it

as a means of reducing potential food waste and encouraging consumption of healthy school meals. For food safety concerns, this practice should be limited to only food items that do not require cooling or heating, such whole fruit, cereal, or packaged crackers.

Training

Wisconsin Department of Public Instruction (DPI) SNT trainings are offered in the summer and select other times throughout the year. Courses provide overviews of all areas of the NSLP and SBP requirements, like Meal Pattern - The Whole Enchilada.

Offer versus Serve (OVS)

School nutrition professionals may benefit from additional OVS training. The [Offer Versus Serve Guidance manual](#) and the [Offer Versus Serve webcast](#) may be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts>). Additionally, [Meal or No Meal](#), a training resource inspired by a game show, may be used for staff determining reimbursable meals (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx>). Practice OVS in the context of White Lake School District's planned menus.

Small Victories (SV)

SV training is designed to celebrate the unique environment that is specific to schools with small student enrollments. The tools found on the [SV webpage](#) are meant to assist foodservice professionals working in small schools as they create their own *Small Victories*. Attending in-person trainings and watching available webcasts count toward [GOALS requirements](#) (<https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>).

Corrective Action

Meal Pattern Finding #1: The daily minimum requirement for m/ma was not met for lunch during the review period. The following represent the portion sizes planned, offered, and served during the review period:

- Wednesday: Turkey and gravy 1/2 cup (cannot determine without standardized recipe)
- Thursday: Chili 1 cup (1.25 oz eq)
- Friday: Chicken/broccoli/rice bake (1.25 oz eq)

The daily minimum requirement for age/grade group 9-12 is 2 oz eq. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Describe **specifically** how the daily minimum requirement for m/ma will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address turkey and gravy, chili, and chicken/broccoli/rice bake in your reply.

Meal Pattern Finding #2: The daily minimum requirement for grain was not met for lunch during the review period. The following represent the portion sizes planned, offered, and served during the review period:

- Tuesday: Ravioli 3/4 cup (cannot determine without additional crediting documentation)
- Wednesday: Stuffing 1/4 cup (cannot determine without standardized recipe), dinner roll (1 oz eq)
- Thursday: Elbow macaroni 3/4 cup (1.5 oz eq)
- Friday: Chicken/broccoli/rice bake (0.75 oz eq)

The daily minimum requirement for age/grade group 9-12 is 2 oz eq. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Describe **specifically** how the daily minimum requirement for grain will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items,

product replacements, etc.). Please address ravioli, stuffing, dinner roll, elbow macaroni, and chicken/broccoli/rice bake in your reply.

Meal Pattern Finding #3: Weekly vegetable subgroup requirement was not met for beans/peas (legumes) during the review period due to 1/8 cup of kidney beans planned, offered, and served in chili. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Describe **specifically** how the weekly vegetable subgroup requirement for beans and peas (legumes) will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).

Meal Pattern Finding #4: Recipes for salad bar lettuce, chicken/broccoli/rice bake, chili, turkey and gravy, egg bake frittata, and smoothies are not standardized to the operation.

Required Corrective Action: Submit standardized recipes for these menu items, including weights or measures for all ingredients, serving size for single portion(s), total number of portions, and total yield (weight or measure [volume]).

Meal Pattern Finding #5: Missing crediting documentation for House Recipe oatmeal packets, offered during breakfast meal observation on Tuesday, December 18.

Required Corrective Action: Submit a PFS for this item. If proper documentation cannot be obtained, discontinue using this product for school meals and submit crediting documentation for a replacement product.

Meal Pattern Finding #6: Apple Whirls (8529745), Cocoa Munchees (6981377), Fruit Whirls Ring Shape (6768436), Bunch O's Krunch (6799167), Frosted Flakes (6781587), Bread Pullman Wheat .5" Sliced (2473292), Dough Roll Cinnamon Sweet (SUPC: 1028521), and Bread Crumbs Plain Medium (6885422) are not whole grain-rich products.

Required Corrective Action: Discontinue serving these items. Submit crediting documentation (e.g. CN label, PFS, complete nutrition facts label with ingredient statement) or standardized recipes for replacement products, as applicable.

Meal Pattern Finding #7: Production records submitted for breakfast and for lunch the review period were not filled in completely nor consistently. All required information on the template must be documented for all menu items.

Required Corrective Action: Submit three days of completed production records for lunch. Select production records you are confident are filled in accurately and completely.

Smart Snacks

There are two situations by which an organization may sell foods and beverages to students during the school day.

1. If they are selling foods or beverages that **meet** the Smart Snacks standards:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
2. If they are selling foods or beverages that **do not meet** the Smart Snacks standards:

- a. These are considered exempt fundraisers. 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.
- b. Exempt fundraisers cannot occur in the meal service area during meal times.
- c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Please update the exiting tracking form to include the location and time of day(s) for foods and beverages sold on the school campus, during the school day. The school day is defined as the period from the midnight before to 30 minutes after the end of the instructional school day.

Buy American

There are four pieces of information per non-compliant item that must be recorded on the [Buy American Non-Compliant Product List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>) or SFA equivalent:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product
 - e. Distribution- record the reason the distributor carries the non-domestic product
 - f. Other- explain

You may record additional information if you find it beneficial.

Finding #8: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American Non-Compliant Product List or SFA equivalent, or did not have proper labeling to identify the country of origin:

- Canned mandarin oranges from China
- Canned pineapple from Indonesia
- Cherry tomatoes from Mexico

Alternatively, schools may use the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) to track product(s) which do not have country of origin labeling and for purchases that do not comply with the Buy American Provision (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>).

Required Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. **Provide a copy of the form(s) that will be used and include any noncompliant products.**

3. RESOURCE MANAGEMENT

White Lake School District did not trigger for a comprehensive Resource Management review.

Non-profit School Food Service Account

Commendations:

Indirect costs are not expensed to the food service account (Fund 50). The business manager is very knowledgeable about allowable costs to Fund 50 and has maintained great communication with the food service director to ensure checks and balances are in place for the management of Fund 50. WUFAR codes are utilized in order to appropriately categorize items reported on the Annual Financial Report (AFR).

Technical Assistance:

- **There was one non-reimbursable meal observed during the day of review at breakfast. This meal was not claimed, however, the cost of this meal cannot be covered by food service. A transfer from the general fund must be made.**
- According to the AFR, per meal costs are unusually high. The per meal revenues were incorrectly recorded to include fund transfers and therefore, the SFA actually has a negative per meal balance. Please assess your current meal costs and consider revising, if able.
- The distribution, collection, and processing of the CEP student level income data must be funded completely separate from the non-profit school food service account. Food service may help with this process, but only if funded outside of the food service account.
- **Adult meals are considered Non-Program Foods and must be recorded as such on the AFR.**
- **The entitlement value of USDA Foods** (see CARS Report) must be recorded as *School Food Revenue* and *School Food Expenditure* for NSLP. Any handling and processing fees must be recorded as a *School Purchased Services Expenditure*.
 - The **Aids Register** shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- The categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Food
 - Only expenses for edible food items and beverages.
 - Equipment
 - Should reflect major purchases of equipment.
 - Purchases Services
 - Report any time you pay someone for services provided such as equipment repair and health inspections.
 - Other:
 - Expenses for paper supplies, chemicals, thermometers, etc.
 - Utensils, pans, and smaller equipment such as a cart.

Resources:

- DPI SNT's [Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>)
- For more information on allowable expenditures to Fund 50, please see the [AFR Expenditure Categories](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc>).
- For more information on revenues and expenditures for the AFR, please see the [AFR In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx>).

Revenue from Non-program Foods

Commendations:

Adult meals are the only non-program foods served and are priced appropriately.

Compliance Reminder:

- If non-program foods beyond adult meals and extra milks are sold at the SFA, the [Non-Program Foods Revenue Tool](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) will be required (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

Thank you for having the “And Justice For All” poster hung in a publically visible location, for sending out the Public Release, and for completing the PI-1441 Civil Rights Compliance Self-Evaluation.

Technical Assistance:

- The SFA utilized the non-CEP Public Release. Going forward, the SFA must utilize the [CEP SFA-wide Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility), and send it to local media and grassroots organizations (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility).
- All program materials and information that is made public (posted, sent to households) **must** contain the USDA Non-Discrimination Statement. There is a shortened version available if the longer version does not fit on program materials: ***This institution is an equal opportunity provider.***

Findings and Corrective Action Needed: Civil Rights

Finding #9: The non-discrimination statement is not included on the following program materials: School Breakfast outreach and SFSP outreach information.

Corrective Action Needed: Please submit these documents, once revised, to the consultant assigned to your review.

Resources:

- [USDA Non-Discrimination Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights)

On-site Monitoring

Commendations:

All required CEP on-site monitoring forms were completed for both breakfast and lunch. Thank you!

Compliance Reminders:

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
 - A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on DPI's [Community Eligibility Provision \(CEP\) webpage](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility).

Local Wellness Policy (LWP)

Commendations:

The LWP contains all required components from the LWP Checklist. The SFA also completed a LWP assessment in 2016. Great work!

Professional Standards

Commendations:

All trainings are completed and tracked for the food service director and staff.

Technical Assistance:

- As the food service director was hired after July 1, 2015, Professional Standards hiring requirements apply. The food service director completed her food safety training upon being hired, however other requirements were not met. With enrollment under 500 students, only one year of school food service experience is required prior to being hired. The current director now has this one year of experience, but going forward, if a new director is ever hired, the [Professional Standards Hiring Requirements](https://dpi.wi.gov/school-nutrition/professional-standards) for food service directors must be met (<https://dpi.wi.gov/school-nutrition/professional-standards>).
- While the hour requirements are met for Professional Standards, one food service employee's trainings could be more applicable to food service operations. In discussion with food service employees, it is recommended additional and more job-specific trainings are completed (e.g. Offer versus Serve, *Adding It Up* SNSDC course).
- The business manager is a non-food service employee with job responsibilities related to the school meals programs. Therefore, she is required to complete the annual Civil Rights training and any other job-specific trainings.

Findings and Corrective Action Needed: Professional Standards

Finding #10: Two non-foodservice aides did not complete the civil rights training.

Corrective Action Needed: Please submit a signed Civil Rights attendance record with the two aides' signatures once they have completed the training. Submit this to the consultant assigned to your review.

Resources:

- For more information on training requirements, please reference the [Professional Standards Training Requirement sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf>).
-

Food Safety and Storage

Commendations:

The food safety plan was site-specific and no storage violations were observed on site. Two food safety inspections were completed in the previous school year. All employee reporting agreements were on file for each foodservice employee.

Findings and Corrective Action Needed: Food Safety and Storage

Finding #11: The most recent food safety inspection is not posted in a publically visible location.

Corrective Action Needed: *Corrected on site. No further action required.*

❑ **Finding #12:** A Standard Operating Procedure (SOP) is not in place for field trip meals.

Corrective Action Needed: Please create a SOP for field trips (utilizing DPI's template) and have it approved by your local sanitarian. Submit this to the consultant assigned to your review.

Resources:

- DPI's [Field Trip SOP](https://dpi.wi.gov/school-nutrition/food-safety) (https://dpi.wi.gov/school-nutrition/food-safety)
-

Reporting and Recordkeeping

Commendations:

All necessary reports were completed. These included the Paid Lunch Price (PLP) report, the Annual Financial Report (AFR), and the FNS-10 report. Thank you! All records are kept on file at the SFA for three years plus the current school year and temperature logs are kept for the minimum six month requirement.

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

Commendations:

SFSP outreach has been completed prior to the end of the academic school year and SBP outreach has been completed prior to the beginning of the school year.

Compliance Reminders:

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.
-

Community Eligibility Provision (CEP)

Commendations:

White Lake has completed its October Direct Certification (DC) run. The SFA retained all appropriate CEP documentation on site. This included information to support the SFAs Identified Student Percentage (ISP), yearly intent forms, and all communications with DPI SNT. Thank you!

Technical Assistance:

- Households must be informed before the beginning of the school year via the [CEP letter](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) to households located on DPI's webpages (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility).
- During school year 18-19, the SFA is in its cycle year four for CEP. If the SFA wishes to continue as a CEP school, the [CEP Application \(PI-6304\)](https://dpi.wi.gov/sites/default/files/imce/forms/xls/f6304.xlsx) must be completed. This application may be submitted anytime between May 1 and June 30, 2019 (https://dpi.wi.gov/sites/default/files/imce/forms/xls/f6304.xlsx).
- A DC run on April 1 is required in order to determine the ISP for the PI-6304.

Compliance Reminders:

- DC must be run once in **October** for reporting and once on **April 1** for the Annual Intent CEP Form.
- [Annual Intent Forms](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) are due to DPI by June 30 each school year (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility).

Findings and Corrective Action Needed: Community Eligibility Provision

❑ **Finding #13:** The CEP Letter was not sent home to households. This is required at the beginning of the year.

Corrective Action Needed: Please submit a statement to the consultant assigned to your review stating when and who will be sending this letter out in the future.

Resources:

- [CEP Calendar of Requirements](https://dpi.wi.gov/school-nutrition/calendar-of-requirements) (https://dpi.wi.gov/school-nutrition/calendar-of-requirements)

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>).



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