

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

**School Food Authority: Marathon County
Juvenile Facility**

Agency Code: 37-4029

Review Date(s): April 18 – 19, 2018

School(s) Reviewed: Shelter Home

Date of Exit Conference: April 19, 2018

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

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Marathon County Juvenile Facility for the courtesies extended to us during the on-site review of this RCCI and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you to this SFA and CBM, meal vendor, 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. During onsite discussions, many items were covered and updated to understand compliance.

The DPI review team appreciates the eagerness of the staff at Marathon County Juvenile Facility for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety operations, completing policies and processes per USDA regulations and working on the local wellness policy.

The DPI review team is confident that Marathon County Juvenile Facility will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- This SFA does not enroll Day Students, so there are no applications or Direct Certification runs.
- The enrollment consists of all free eligible students by being wards of the court and family of one.

Resources:

- [RCCI webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/rcci) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/rcci>)

- [Calendar of Requirements for RCCIs with No Day Students](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-rcci-without-day-students.pdf)
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-rcci-without-day-students.pdf>)
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Verification

Commendations:

- Verification process is not required since there are no Day Students at this facility.
 - Thank you for completing the Verification Collection Report (VCR).
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Meal Counting and Claiming

Commendations:

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance. This SFA enters the meal into the software upon receipt of the complete reimbursable meal.
 - The authorized representative completes an edit check before entering the monthly claims for reimbursement.
 - The meal counting and claim for the Review Month was conducted perfectly.
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2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

We extend sincere appreciation to the Food Service director and the off-site vendor. Thank you for your prompt communication, timeliness, and excellent organization of crediting documentation. We also appreciate the time the superintendent set aside to answer questions and provide quick action during the on-site portion of the review. It has been a pleasure reviewing Marathon County.

Comments/Technical Assistance/Compliance Reminders

Training: Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [training webpage](https://dpi.wi.gov/school-nutrition/training) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer around the state of Wisconsin. An RCCI training is scheduled for July 23-24 in Madison. There will be emails sent in the coming months regarding the trainings available at these locations. You may also check back on the [School Nutrition Team Training](https://dpi.wi.gov/school-nutrition/training) webpage (<https://dpi.wi.gov/school-nutrition/training>). Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](https://dpi.wi.gov/school-nutrition/directory) can be found on our website (dpi.wi.gov/school-nutrition/directory).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding #1: Signage (to be completed by Marathon Co facility/staff)

The National School Lunch Program requires that schools identify at the meal service location what constitutes as a reimbursable meal at breakfast and lunch. Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage). If you are

interested in ordering signage from SNT, please visit the [Team Nutrition](http://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

It is required that signage is displayed in all locations where reimbursable meals are served (eg, shelter care, secure care).

Corrective Action Needed for Finding #1: *Signage hung on site, no further action required.*

☐ Finding #2: Production Records (to be completed by Marathon Co facility/staff)

Milk is a required component as part of the National School Lunch Program. You must record daily usage by milk type on your production records.

Corrective Action Needed for Finding #2: *Statement submitted on site, no further action required.*

☐ Finding #3: Daily and weekly M/MA shortage ***Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*

Standardized recipes (to be completed by vendor/management company)

Recipes used during the week of review list the serving size as the *ounce equivalents* provided. Serving sizes should be indicative of the *actual weight* or volume to be served. Ounce equivalents can be recorded within the recipe or under component contribution on production records. Note that recipe ingredients divided by number of servings per PFS crediting information does yield appropriate ounce equivalents.

Students must be served minimum of 2oz eq M/MA daily, and 14 oz eq over a 7-day week. During the week of review, the following was served:

- Monday: 2 oz by weight turkey is served, crediting as 1.25 oz eq
- Tuesday: 1 oz by weight ham is served with 1 slice of cheese, crediting as 3/4 oz eq and 1/2 oz eq respectively, for a total of 1.25 oz eq
- Wednesday: 1 cup of beans is served, crediting as 4 oz eq
- Thursday: 3.2 oz by weight sloppy joe is served, crediting as 2 oz eq
- Friday: 2 oz by weight ham is served, crediting as 1.5 oz eq
- Saturday: 2 oz by weight turkey is served, crediting as 1.25 oz eq
- Sunday: 6 oz by weight stroganoff is served, crediting as 2 oz eq

Corrective Action Needed for Finding #3: Ensure that all recipes and production records communicate the serving size by intended volume or weight. Submit revised recipes served during the week of review:

- Baked turkey
- Cooked ham
- Ham (from ham and cheese sandwich)

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative 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

Commendations:

- Revenues and Expenditures were broken out correctly on the submitted Annual Financial Report for school year 2016-17.
 - The SFA contracts with a vendor, CBM, for breakfast and lunch meal service. Nice work administering this agreement.
 - This SFA doesn't sell any nonprogram foods, so they are exempt from the USDA requirement to complete an annual nonprogram food revenue tool.
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4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

- The required "And Justice for All" posters need to be posted in public view where the program is offered.
- The SFA is aware of addressing students in the primary language and finds resources in appropriate languages, as necessary.

Technical Assistance:

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 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.
- **The SFA superintendent will include the full nondiscrimination statement on the website for juvenile justice.**

Special Dietary Needs

- 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>)
- 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.

- This SFA does not use the Offer Vs. Serve model, so milk is a component that must be served for a complete meal. An SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. 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>).

Processes for complaints

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the facility must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days.
- 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](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed – Civil Rights

❑ **Finding # 4:** The SFA has not yet completed all of the annual civil rights items this school year. [Civil rights training](#) must be conducted on a yearly basis for all staff who administer any portion of a school nutrition program (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>). The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

Corrective Action Needed for Finding #4: *A statement was provided by the superintendent onsite that the civil rights training will be provided at the May 2018 in-service for employees.* The superintendent will complete the PI-1441 form and submit a copy.

On-site Monitoring

Technical Assistance:

- Every school year, each SFA with more than one site must perform at least 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.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](#) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).
- **These on-site monitoring forms were completed during the Administrative Review.**

Local Wellness Policy

Compliance Reminders:

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final

rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

- The SFA is in the process of updating the Local Wellness Policy (LWP) to include more specific goals pertaining to nutrition promotion and education, and physical activity, and to define that school meals comply with USDA nutrition guidelines according to the Healthy, Hunger-Free Kids Act of 2010. The revision will also clearly define LWP leadership by the program superintendent. The consultant and superintendent reviewed the LWP and its compliance and future revisions to comply with the final rule.

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-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>).

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. You can find information on our [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>).

Professional Standards

Compliance Reminders:

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program. Four hours of training would be necessary for each of

the staff members that assist with the school nutrition process. These trainings are tracked in electronic or paper fashion.

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

Annual Training Requirements for All Staff

Directors: 12 hours

Managers: 10 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

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

Findings and Corrective Action Needed – Professional Standards

❑ **Finding # 5:** SFAs should document all required training information for staff with school nutrition duties and maintain that documentation for 3 school years plus the current year. On the training tracker, please include the name of staff person, date hired, title of position or brief list of core duties/responsibilities, and the status of part-time or director. The training tracker will contain all training hours, like food safety, Blood-borne pathogen and emergency trainings, local wellness policy and the required civil rights training.

Corrective Action Needed for Finding #5: Please submit a statement of how the training hours will be tracked for staff with school nutrition duties.

Water

Commendations:

- Water is available for all students in the Shelter Home in the common areas with free access. The students in the secure area have drinking fountains in the individual cells.
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Food Safety, Storage and Buy American

Commendations:

Food Safety Inspections

- The SFA has two food safety inspections during each school year, including food safety inspection and a review of the site's Food Safety Plan.
- The most current food safety inspection report is posted in public view.
- Temperature logs are kept for all cooling equipment; it is part of a daily routine, along with sanitizer logs.
- [A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Plans

- The appropriate food safety plan was available to review and contained the process 1, 2, and 3 items, all applicable standard operating procedures (SOP), equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

Technical Assistance:

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf>). This SFA trains staff with a different process in lieu of the employee reporting agreement per the local sanitarian.

Comments/Technical Assistance/Compliance Reminders – Buy American

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

The Buy American provision should be included in solicitations, contracts, and product specifications. 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>).

Findings and Corrective Action Needed: Buy American

❑ Finding #6: Non-compliant items (to be completed by vendor/management company)

Meals are prepared in bulk at Lincoln County Jail, sent to and plated at Marathon County Jail, and then sent to and served at Marathon County Juvenile Facility. During onsite review we were unable to visit Lincoln County to assess product inventory for Buy American compliance.

Corrective Action Needed for Finding #6: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

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. A template form is located on the [procurement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).

Reporting and Recordkeeping

Commendations:

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
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School Breakfast Outreach

Commendations:

- This SFA provides outreach for breakfast with monthly menu posting including the meal components.
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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](https://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



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