

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

School Food Authority: Hillel Academy

Agency Code: 400856

School(s) Reviewed: Hillel Academy

Review Date(s): 1/9/19-1/10/19

Date of Exit Conference: 1/9/19

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 for \$10 for the week. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, 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).
- The US Department of Agriculture 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Hillel Academy 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. 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

The Nutrition Program Consultant reviewed all 73 students who were receiving free and reduced benefits during the month of December. Three students were receiving the incorrect benefits. However, two of those students showed up on the Direct Certification run the day before the Administrative Review. The SFA only received one application.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Direct Certification

- Direct certification must be run a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.

Verification

SFA did not complete Verification for the 2018-2019 SY. Each school year, all SFAs are required to complete the Verification Process by November 15. If the SFA did not receive any applications for the current school year, then the SFA would not have to complete the Verification Process, but would still be required to complete the Verification Collection Report.

*Reminder that the Verification Collection Report is due by February 1, 2019.

Meal Counting and Claiming

According to the SFA's online contract with DPI, meal counts are supposed to be recorded at the end of the line with a roster checklist after the students' take a reimbursable meal. While observing meal service, there was a delay from the original start time of service. Students were being checked off while they stood in line before they received a reimbursable meal.

As the students came through the line, some of them did not take all of the required components of a reimbursable meal, but they were already checked off as having a reimbursable meal. Some of the staff

seemed confused as to what components made up a reimbursable meal. After meal service, counts are entered into the software system.

SFA was not receiving commodities for the 2018-2019 SY but was interested in participating in the commodities program for the 2019-2020 SY. For the 2019-2020 SY, be sure to update your online contract with DPI to reflect these changes. More [information on commodities](#) can be found online (<https://dpi.wi.gov/school-nutrition/usda>). Specialists are available to assist as well.

Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](#) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director, school nutrition professionals, and staff at Hillel Academy. We appreciate your time and efforts spent preparing for and participating in the onsite review. All staff were welcoming, willing to answer questions, and receptive to feedback. The amount of scratch and speed-scratch cooking done to prepare nutritious lunches for your students is commendable. It is evident that all staff involved with the school meals program truly care about what is best for your students. Thank you for all that you do for the students at Hillel Academy!

Comments/Technical Assistance/Compliance Reminders

Crediting and Documentation

- The [USDA 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, 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 one 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.
- The FBG also provides the raw to cooked yields for products, which is essential when developing standardized recipes that provide the desired crediting. This was discussed during the onsite review, using the Sloppy Joe beef as an example.
- Most fruits and vegetables credit by volume served (e.g., ½ cup peaches, drained will credit ½ cup fruit) and the FBG will note if the crediting is different based on volume served (e.g., one medium banana credits ½ cup fruit). Most meat/meat alternates and grains credit by weight (i.e., 2 ounces of cooked, plain chicken breast credit 2.0 oz eq meat/meat alternate; 1 ounce brown rice credits 1.0 oz eq grain). If the product is not listed in the FBG, additional crediting documentation is required.
- 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.
- A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the

information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).

- A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that include these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.
- Collect new product labels annually and update records when new products are purchased. More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

Two Methods for Crediting Grains

- Grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). If a product is not listed in Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the *grams of creditable grain* in the product.
- 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. 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 as 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.

Production Records and Transport Sheets

- The daily transport sheets and production records reflect the same information twice. In order to increase efficiency, consider consolidating the transport sheet and production record into one document.
- When using the K-8 meal pattern, it is not necessary to split the production records into two grade groups since all students are being served the same foods in the same serving sizes. Consider using the production record template for one grade group. The template may be modified, allowing the necessary temperatures from the transport sheet to be included on the production record.
- Continue to work with all staff members to accurately record planned serving sizes, planned usage, actual usage, and leftovers for all menu items.
- The production records submitted for the week of review show milk usage for only one milk type. Through conversations with staff, it was determined that two varieties of milk are offered on all days that milk is served, but students only select the flavored variety. Since production

records serve as documentation that the meals offered meet all meal pattern requirements, the actual usage for both milk varieties should be documented, even if one is zero.

- It may be simpler to list the planned serving size for the sandwiches on the production record as “1 each.” The actual weights and measures of all the ingredients in the sandwich are documented on the standardized recipe.
- There were recordkeeping discrepancies with the vegetables offered as part of the salad bar on Monday during the week of review. The vegetables offered were recorded on both the transport sheet and salad bar production record. However, the varieties recorded were not consistent between the two documents. Staff stated that the vegetables listed on the transport sheet were accurate, so these vegetables were included in the crediting for this meal. It is important for these records to be accurate as they document that food meeting the meal pattern was served.
- Please ensure that any additional quantities of menu items transported to the service kitchen during lunch service are documented on the production record. For example, when additional pans of fruit are transported to the service kitchen for the second portion of lunch service, this additional quantity must be documented.
- Strong, clear communication is essential between the staff planning, preparing, and serving meals. Production records and standardized recipes are tools to facilitate this communication, ensuring students are served nutritious, reimbursable meals.

Crediting Raw Leafy Greens

- Raw, uncooked leafy greens credit for half the volume served in their fresh forms. For example, ½ cup of fresh, baby spinach credits as ¼ cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces, even if they are not in the dark green subgroup. If leafy greens are cooked, such as steamed spinach, they credit as the actual volume served.

Salad Bar Planned Serving Sizes

- When offering multiple vegetables as part of a salad bar, the planned serving sizes should reflect the average realistic volume of each vegetable students choose. For example, during the week of review, all vegetables offered with the salad bar had a planned serving size of ¾ cup. While students must be served ¾ cup total vegetable for a reimbursable meal when using the serve model, it would be more realistic for students to choose multiple smaller servings of different vegetables to reach the required ¾ cup.
- The total amount of vegetables from each subgroup served over the week may need to be adjusted to account for the more realistic salad bar planned serving sizes.

Signage

- Multiple signs were posted in the lunch serving area explaining what constitutes a reimbursable meal. However, some signs contained language related to Offer versus Serve (OVS), which is not being utilized. The signs containing OVS language were removed prior to lunch service on the day of review. Please ensure all posted signage aligns with your service model going forward.

Offer versus Serve

- Offer versus Serve (OVS) is not required for grade K-8 students. The benefits of OVS include a potential reduction in food waste, providing students with more choice in what they choose for a reimbursable meal, and additional accommodations for dietary preferences.
- As discussed during the onsite review, additional attention will need to be given to production amounts initially if OVS is implemented. However, after the cycle menu is repeated one or two times using OVS, historical data will allow for more accurate production forecasting.

Additionally, the “planned/actual number of servings prepared” column on the production record would need to be completed for all menu items when using OVS since this information will likely vary for each menu item.

- Some schools choose not to use OVS as a way of encouraging students to try new foods or increase consumption of fruits and vegetables. The decision on whether or not to implement OVS at Hillel Academy ultimately depends on your student population and the service model that will best fit their needs.
- The [Offer Versus Serve Guidance manual](#) and the [Offer Versus Serve Webcast](#) contain additional information on OVS (<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>).

Timing of Meal Counts

- During the onsite review, it was discussed that the lunch count is called into the kitchen between 9:00 and 9:30 am daily. Since many menu items are made from scratch, production must be started prior to receiving the meal counts for the day. On some days, this may result in overproduction and increased food cost.
- Consider implementing a system to allow meal counts to be called in earlier for more accurate production. Additionally, staff members responsible for planning and producing meals are strongly encouraged to use the historical data from previous production records to better forecast the number of meals and quantities needed for each meal.

Extra Serving Utensils in the Meal Service Kitchen

- The incorrect spoodle size was sent along with the coleslaw on the day of review. This was corrected prior to service by requesting the correct spoodle be sent from the production kitchen. However, this resulted in a delay in the beginning of meal service.
- Consider keeping a small collection of spoodles and scoops in the service area in the event that the wrong size spoodle is sent or a serving utensil is dropped.

Printed Menu

- The printed lunch menu for December 2018 includes the correct shortened USDA nondiscrimination statement. However, the January 2019 menu includes an outdated version of this statement. Please update all menus to the current shortened nondiscrimination statement: This institution is an equal opportunity provider.
- The milk choices listed on the December 2018 menu accurately reflect what is available for the K-8 students. The January 2019 menu provides the options available to the preschool students. Please ensure the milk choices available to the K-8 students are accurate on the menus going forward.

Training

- Regular trainings are offered on the Wisconsin Department of Public Instruction (DPI) webpage as webcasts, webinars, and on-site trainings. Check our [Training](#) webpage often for current and upcoming opportunities (<https://dpi.wi.gov/school-nutrition/training>). Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>).
- DPI conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school’s nonprofit food service fund. Information, including

dates and locations, will be posted on the DPI [training](http://dpi.wi.gov/school-nutrition/training) webpage as they are scheduled (<http://dpi.wi.gov/school-nutrition/training>).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Based on the Resource Management Questionnaire, the SFA triggered for a comprehensive review of the Nonprofit School Food Service Account.

Annual Financial Report

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “nonprogram foods”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
 - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Paid Lunch Equity

SFA completed the PLE survey and had a positive balance during January of 2018. Based USDA’s PLE exemption guidance, Bader Hillel was except from having to raise the cost per meal for the 2018-2019 SY.

Revenue from Nonprogram Foods

SFA only served extra milk and adult meals as nonprogram foods. These items must be broken out on the Annual Financial Report each year.

Indirect Costs

SFA was not charging any indirect costs to the food service account.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

SFA was following USDA civil rights regulations. Staff were training annually on civil rights, the self compliance form was completed before October 31st.

On-site Monitoring

N/A to SFA.

Local Wellness Policy

SFA had a thorough local wellness policy on file that was being utilized.

Smart Snacks

At the time of the on-site review there were no competitive foods or beverages sold at Hillel Academy. 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. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools 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

Professional standards training hour's requirements were met. The SFA kept a folder with everyone's training hours and certificates but was not using a central tracker.

- 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.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

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.

Water

Water was available for breakfast and lunch.

Food Safety

SFA was actively using the food safety plan and had the appropriate SOPs on file. Food safety inspections were on file.

Buy American

Comments/Technical Assistance (TA)/Compliance Reminders

- 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. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
 - If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can accepted within an email.
 - The label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
 - Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
 - Agricultural products that are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
 - 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 and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy](#)

[American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

- 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. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- For domestic products without country of origin labeling (COOL), consider 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) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- More information on this new requirement 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>).

Reporting and Recordkeeping

Records kept on file for 3 years plus the current.

5. OTHER FEDERAL PROGRAMS REVIEWS

Summer Food Service Program (SFSP) Outreach

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Hillel Academy, USDA requires 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](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator

Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

Corrective Action Needed

1. MEAL ACCESS AND REIMBURSEMENT

Findings and Corrective Action Needed: Counting and Claiming

Meal Access Finding #1: One student was issued incorrect benefits.

Corrective Action Needed #1: Send the household the adverse action that was sent to the SFA via e-mail. For a better benefit, change the benefit within 3 days. For a lesser benefit, change the

benefit after 10 days. Send a copy of the letter sent to the households to the Nutrition Program Consultant by e-mail once completed.

Meal Access Finding #2: SFA did not send out the Public Release for the 2018-2019 SY.

Corrective Action Needed #2: Submit a statement of understanding that each year before the school year starts, the Public Release must be sent out. State which organizations and local news source Hillel Academy plans to send the Public Release too.

Meal Access Finding #3: SFA did not send out the application packet to all of the households within the school.

Corrective Action Needed #3: Submit a statement of understanding that every year, each household must be sent the application packet (Application, Frequently Asked Questions and how to fill out a form). When Direct Certification is run before the school year and the students show up as free, the notification letter sent to the household is all that is needed and they do not need to be sent an application packet. All of the remaining students must be sent an application packet.

Meal Access Finding #4: SFA did not complete Verification for the 2018-2019 School Year.

Corrective Action Needed #4: Complete the Verification Process. Once completed, send the Nutrition Program Consultant all of the documentation from the Verification Process.

Meal Access Finding #5: SFA only ran Direct Certification once at the beginning of the school year.

Corrective Action Needed #5: Submit a statement of understanding that Direct Certification must be run.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Two students at Hillel Academy selected non-reimbursable meals during lunch meal observation on January 10, 2019. One student's meal was missing the fruit component. The other student's meal was missing the juice served in place of the milk component on this day. Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.

- ❑ **Meal Pattern Finding #1:** The standardized recipes submitted for the week of review did not reflect the ingredients and quantities actually used to prepare menu items. Additionally, recipes for the WG Grilled Cheese Sandwich and Corn & Edamame Salad that were served during the week of review were not submitted. All menu items with two or more ingredients require a standardized recipe.

The staff member responsible for preparing meals was able to provide information on the ingredients and quantities actually used during the week of review and day of review for crediting purposes.

Corrective Action Needed: Submit a standardized recipe for the following menu items served during the week of review:

- Cheese Noodle Kugel
- Mushroom Barley Soup

- Chicken Fajita
- Cream of Tomato & Rice Soup
- Meat Sauce
- Tuna Melt on WG Bread
- WG Grilled Cheese Sandwich
- Corn and Edamame Salad

Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the [Standardized Recipes webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). As discussed during the onsite review, the recipe template for one grade group may be used when using the K-8 meal pattern since all students are served the same serving sizes.

Once the recipes are completed, these dishes should be prepared as stated on the recipe. All ingredients must be weighed or measured to ensure the final product is consistent in quality and credits as intended. Additionally, as you revise the recipes, each serving utensil should be evaluated to ensure each serving credits as intended.

- Meal Pattern Finding #2:** Additional training is needed for any staff members involved with creating and revising the standardized recipes.

Corrective Action Needed: View the [What's the Yield with Standardized Recipes](https://dpi.wi.gov/school-nutrition/training/webcasts#sr) webcast for additional training prior to completing the corrective action for Meal Pattern Finding #1. (https://dpi.wi.gov/school-nutrition/training/webcasts#sr). Submit a certificate of training completion for all staff members who view the webcast.

- Meal Pattern Finding #3:** Juice is served twice per week in place of milk as an allowable meal pattern variation for religious reasons. When using this variation, an equal amount of full-strength juice must be served in place of the milk, which would be 1 cup (8 fl oz) for K-8 students. Prior to the onsite review, it was stated that the planned serving size for the juice was 6 fl oz. At the request of the reviewer, the planned serving size was corrected to 1 cup (8 fl oz) prior to the onsite review. However, at the beginning of lunch observation, the juice was not being measured. Staff was uncertain of the serving cup size and the volume of juice actually being served. Students were allowed to take this undetermined volume of juice for a portion of lunch service. At one point during lunch service, a full 1 cup (8 fl oz) of juice was measured and this was a greater volume than the cups could hold. Larger cups were located and students in the later portion of lunch service were served the full 1 cup (8 fl oz) of juice. **Students must be served all five full components for a reimbursable meal when using the serve model. Since juice was not served in the full quantity for a portion of meal service, the meals counted prior to the correction will be disallowed.**

Corrective Action Needed: Submit a written statement explaining how juice will be served going forward. If an alternate juice product is used, such as a juice box, submit the product information for the new product.

- Meal Pattern Finding #4:** Since the same cups were used during the week of review and the juice was not measured, there was a juice (milk) shortage on Tuesday and Thursday during the week of review when the juice was served in place of milk.

Corrective Action Needed: The corrective action submitted for Meal Pattern Finding #3 will satisfy this finding.

Repeat violations of a milk (or juice substituted for milk) quantity shortage during subsequent Administrative Reviews may result in fiscal action.

- ❑ **Meal Pattern Finding #5:** The same cups were used to serve the unflavored milk variety during the week of review. However, staff stated that no students select the unflavored milk variety. This statement was supported by having no unflavored milk usage recorded on the production records for the week of review. These days will not be considered as having a milk shortage, but will require correction. The flavored milk variety is served in 1 cup (8 fl oz) cartons; no corrective action is required for this milk.

Corrective Action Needed: Submit a written statement explaining how the unflavored milk will be served going forward.

- ❑ **Meal Pattern Finding #6:** There was a beans/peas (legumes) vegetable subgroup shortage for the week of review at lunch. A total of $\frac{1}{8}$ cup vegetable from this subgroup was offered in the Corn & Edamame Salad on Friday during the week of review. K-8 students must be offered $\frac{1}{2}$ cup of vegetables from the beans/peas (legumes) subgroup weekly.

Corrective Action Needed: Submit a written statement specifically explaining how the menu for the week of review will be changed to ensure that at least $\frac{1}{2}$ cup of vegetables from the beans/peas (legumes) subgroup will be served to students at lunch.

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

- ❑ **Meal Pattern Finding #7:** It is necessary for those involved with planning, preparing, and serving meals to understand how each menu item credits toward the meal pattern.

Corrective Action Needed: Any staff members responsible for planning, preparing, and serving the meals should review the [Crediting in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf) handout (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf>). Submit a written statement confirming the necessary staff members have reviewed the handout.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

3. RESOURCE MANAGEMENT (RM)

Findings and Corrective Action Needed: Annual Financial Report (AFR)

RM Finding #1: Annual Financial Report does not have food, equipment purchased services and other cost associated nonprogram foods and the SFA sells adult meals, cold lunch milk and extra entrees.

Corrective Action Needed #1: Please provide a statement going forward that all nonprogram food expenses and revenues will be broken out from NSLP and allocated to the nonprogram foods line

on the annual financial report. We have a [resource](#) on our website to aid you in this calculation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

RM Finding #2: On the 2017-2018 Annual Financial Report, \$10,766.51 was recorded in the PLE transfer section under Revenues. SFA did not opt to transfer PLE funds for the previous and current school year. Funds were allocated incorrectly on the AFR.

Corrective Action # 2: Adjust the Annual Financial Report to reflect where the \$10,766.51 came from. Scan and e-mail the corrections to Jacque Jordee, Jacque.jordee@dpi.wi.gov and CC the Nutrition Program Consultant on the e-mail.

Findings and Corrective Action Needed: Unpaid Meal Charge Policy

RM Finding #3: SFA did not have an unpaid meal charge policy on file.

Corrective Action Needed #3: Submit a timeline for creating an unpaid meal charge policy.

4. GENERAL PROGRAM COMPLIANCE

Findings and Corrective Action Needed: Professional Standards

General Program Compliance Finding #1: SFA did not have a central tracker for tracking all of the food service staff training hours.

Corrective Action Needed #1: Submit a statement on which method the SFA will use to track all of the training hours (DPI tracking tool, USDA tracking tool, google documents, word document, etc.)

Findings and Corrective Action Needed: Buy American Provision

General Program Compliance Finding #2: The following products were identified in the SFA's storage area as non-domestic and not documented:

- Edamame (China)
- Bananas (Costa Rica)

Corrective Action Needed #2: Complete and submit [Non-Compliant Product Forms](#) for the products listed above (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>). Complete and maintain forms for each non-domestic product used in the National School Lunch Program going forward.

General Program Compliance #3: SFA did not have a processing of complaints policy developed specifically for the Child Nutrition Programs.

Corrective Action Needed #3: Submit a timeline for when the SFA will have a written policy.

5. OTHER FEDERAL PROGRAMS REVIEWS

Findings and Corrective Action Needed: Seamless Summer Food Program

Other Finding #1: SFA did not promote the Seamless Summer Food Program.

Corrective Action Needed #1: Submit a statement of how the SFA will promote the Seamless Summer Food Program for the summer of 2019.

The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

