

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

School Food Authority: South Milwaukee School District **Agency Code:** 405439

School(s) Reviewed: Rawson Elementary & Blakewood Elementary

Review Date(s): 12/10/18-12/12/18

Date of Exit Conference: 12/12/18

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](#) 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 South Milwaukee School District for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. 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

Free and Reduced Price Meal Applications

- The determining official did a wonderful job approving applications. Follow up with households was well documented. Great job!
- The State Agency reviewed a sample size of 475 students receiving free and reduced benefits to assure households were receiving the correct benefits. Out of this sample, all benefits except two households were determined appropriately.
- There were a couple of applications that were not signed and dated by the determining official. When determining applications manually, the determining official should sign the back of each application. If entering the application into the software for the software to determine the eligibility, the date and electronic signature should be added into the software.

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

Limited English Proficiency (LEP)

- SFA did a great job of having their online application translated into three different languages to meet the needs of their student population.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.

- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](#) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Direct Certification

- The Determining Official was meeting the requirements for running direct certification and was running direct certification every time new students enrolled at the SFA. Great job!

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. Templates for [Disclosure Agreement for School Staff](#) & [Disclosure Agreement](#) for other agencies are located on the SNT website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>)

Verification

The Verification Process was completed by November 15th. The Verification Collection Report (VCR) was not yet completed for the 2018-2019 SY. The VCR must be completed by February 1st.

Meal Counting and Claiming

Meal counting and claiming was accurately reported. Edit checks were used. More information on counting and claiming specifics can be found in the DPI claim manual, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/site-based-claiming-manual-accessible-version.pdf>.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the school nutrition professionals and dedicated staff at South Milwaukee School District. We thoroughly appreciate your time and cooperation during the Administrative Review (AR). Great effort is made to deliver consistent, high-quality meal and provide all students with access to nutrition throughout the school day. All of the staff were very welcoming and helpful while we were onsite.

Thank you, also, to the Food Service Director for sending documentation and promptly answering questions both prior to the on-site review and during the on-site review. We very much appreciate all that you do for the students of South Milwaukee!

Comments/Technical Assistance/Compliance Reminders

Training:

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free and reduced meal applications, meal pattern, and record keeping requirements. Travel and meal expenses are allowable food service expenses. Information on upcoming trainings can be found on [DPI's Training Page](https://dpi.wi.gov/school-nutrition/training#up) (<https://dpi.wi.gov/school-nutrition/training#up>).

Additionally, regular trainings are also offered on the Wisconsin Department of Public Instruction (DPI) webpage as webcasts, webinars, and on-site trainings. Check our [Training](https://dpi.wi.gov/school-nutrition/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](https://dpi.wi.gov/school-nutrition/directory) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>).

Child and Adult Care Food Program (CACFP)

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and

children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

The new Meal Pattern Charts for the CACFP meal pattern can be found on [USDA's CACFP](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf) webpage (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf).

Sugar in cereal

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements. For more information, including the sugar limit charts, calculation examples, and cereals that meet the sugar requirements, please refer to the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

Offer Versus Serve (OVS) & family style meal service in CACFP

Offer Versus Serve (OVS) is not an appropriate service style for pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service.

According to guidance, when using family style meal service, a sufficient amount of prepared food must be placed on each table to provide the full required portions of each of the food components for all children at the table, and to accommodate supervising adults if they eat with the children.

Family style meal service allows children to make choices in selecting foods and the size of initial servings. Children should initially be offered the full required portion of each meal component. Supervising adults should actively encourage (but not force) children to try components and accept full portions during the meal. If a child refuses to take one or more food components, he or she should be offered that food again before the meal is finished.

During onsite observation, food was not on the tables, and children did not serve themselves. Children, based on their abilities, should be given the option to serve themselves. A teacher or aide may help, but the child should lead. If instead children are

served pre-plated meals, children must be provided with the minimum serving of each component (e.g. take one of everything planned).

Training resources on family style meals may be found on SNT's [Infant and Preschool in NSLP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Additional resources are available on the Community Nutrition Team's [Nutrition and Wellness Training](https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice) webpage, under the Meal Service heading (<https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice>).

[Video](https://education.mn.gov/MDE/Video/?group=Communications&id=058099) example for family style meal service (<https://education.mn.gov/MDE/Video/?group=Communications&id=058099>).

Milk in CACFP

Milk is a required component to be offered to children when using family style meal service and served meals. Teachers may serve the milk when using family style meal service, however, children must be served the full serving of milk when doing so. A variety of milk does *not* need to be offered under CACFP.

On day of observation, two non-reimbursable meals were served at Blakewood Elementary, where staff has elected to serve pre-K students all meal components. Both students were not served milk at parental request; however, no signed medical statements were on file for either child. The ability to decline a component is an intrinsic part of the OVS framework, but under CACFP, OVS is not an acceptable option for an unsupported medical claim.

Special Dietary Needs

Students seeking accommodations for a diet-related disability must provide a medical statement signed by a licensed medical practitioner (such as a physician, nurse practitioner, or physician assistant). The signed medical statement must include a description of the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, and an explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted). More information regarding accommodating special dietary needs, including a medical statement template, can be found on the [Special Dietary Needs](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Crediting Documentation:

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. Additionally, check that the PFS is accurate, detailing product composition and crediting information in order to be served in School Meal Programs. One food item, 3-oz. Red Gold salsa cups, did not have an accurate PFS with all of the product composition details

needed to confirm the crediting as stated on the packaging. Sufficient weekly quantities of Red/Orange vegetables and daily quantity of vegetables were offered and this did not result in any shortages.

Standardized Recipes

Standardized recipes are kept on file, but could use some updating. Be specific and include detailed information about the specific ingredients, equipment, and procedures. Make sure that each standardized recipe clearly states how many servings it makes, the serving size(s), recipe yield, and the equipment or utensils used for portioning or serving. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Portions

Portion sizes served must be full, level scoops in standardized measuring utensils. Whole strawberries of varying sizes with the stem on were portioned into 5.5 fluid ounce cups during onsite observation. Some food items, such as whole strawberries, do not fit easily into portion cups, leaving substantial empty air space. A full ½ cup of strawberries must be in the portion cups to be considered the ½ cup fruit required to be offered with the reimbursable meal and to be the required ½ cup fruit selected under Offer versus Serve (OVS) if they do not select any other fruits or vegetables.

In instances where foods do not easily fit into a standardized measuring tool and/or when foods come in a wide-range of sizes, the [USDA Food Buying Guide for Child Nutrition Programs](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) (FBG) may be used if a corresponding entry exists (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). The FBG contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods). Onsite technical assistance given on using FBG to determine the weight of ½ cup of strawberries prior to service.

Sufficient Quantities and Food Waste

During onsite observation, food prepared for Breakfast in the Classroom (BIC) did not include enough fruit so that each student had access to the 1.0 cup meal pattern requirement. For example, one prepared tray had 10 juice boxes (each crediting as 0.5 cup fruit) and 4 packets of pre-sliced apples (each crediting as 0.5 cup fruit) for a class of approximately 13 students. TA given onsite and more fruit was added to the breakfast trays prior to delivery to the classrooms. School nutrition professionals also noted that if students wanted more of a component, in this case the fruit, they would be allowed to come to the cafeteria to request it and it would be provided without question.

While it is appropriate to take historical data into consideration when forecasting quantities of food needed, students must have reasonable access to the full component. The burden should not be placed on the student to request a full component.

This brought up the concern of food waste. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Additionally, if food waste is a continued concern, the SFA can consider updating their BIC Standard Operating Procedure (SOP) so that only Time/Temperature Controlled (TCS) foods that have been held without temperature control need to be thrown away.

Production Records and Transport Sheets

Currently, 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.

Be specific on production records about the identity, brand, recipe number, and description of the items served. Include portion sizes for each grade group served. Update any crediting information listed on these production records to accurately reflect the menu item(s) served. Make sure that milk usage is recorded by type for each meal service and that there is a clear delineation between each meal service (whether it be breakfast, snack, or lunch - if they are on the same production record, there must be a clear distinction between each meal service).

A list of production record requirements (“[Must Haves and Nice to Haves](#)”) and sample production record templates can be found on our [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Breakfast Signage and Communication:

Breakfast in the classroom process and point of service need some clarity. There is no signage indicating what is offered and what students must select to build a reimbursable meal. This may be posted on the trays delivered to the classrooms or in the classrooms themselves. Signage examples can be found on our [Signage](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Signage must be posted and visible to all students indicating the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable. The breakfast signage must list the three components and the four items offered, and must communicate to students that under Offer versus Serve (OVS), they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination.

As discussed onsite, it may also be beneficial to provide classroom staff with a laminated daily information sheet that clearly states what combinations of food items build a reimbursable meal. For example, it is up to the menu planner to determine in advance whether items crediting as 2.0 ounce equivalents (oz eq) count as one or two food items. He or she must clearly communicate to students and staff what foods students can select in order to have three food items for a reimbursable breakfast.

Additionally, clear and concise communication between menu planner and prep staff is needed. Updating standardized recipes to include more details such as how to specifically

portion items or which serving utensil should be used for service will reduce confusion in the satellite kitchens.

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. Documentation was provided to support the comprehensive review.

Paid Lunch Equity

SFA submitted and completed the PLE tool for the 2018-2019 SY.

Revenue from Nonprogram Foods

SFA submitted the Nonprogram Foods Revenue Tools with all of their costs priced out.

Indirect Costs

SFA was charging gas to the food service account. The kitchen was metered separately from the rest of the building.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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.

Special Dietary Needs

- On the day of review, there were two non-reimbursable meals found. The 4k class was offering the CACFP meal pattern and did not have a medical statement on file for the two students who did not take a milk.
- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives

guidance on special dietary needs, as well
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)

- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but 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>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

On-site Monitoring

SFA had completed most of the on-site monitoring for the 2018-2019 SY. On-site monitoring must be completed by February 1.

Local Wellness Policy

SFA had a detailed local wellness policy on file that was being continuously being utilized. Great job!

Professional Standards

Professional standards requirements were being met. SFA was logging training hours on a word document for each employee. The document listed the required hours needed, training received and duration of the training.

Water

Students had access to the water fountains at both review sites.

Food Safety

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

Buy American

Comments/Technical Assistance (TA): 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.
- What is acceptable to determine compliance on a label? 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.
- Many products do not list country or origin or simply have information such as “marketed by” or “distributed by,” which makes identifying compliance or non-compliance with the Buy American provision challenging. If no country of origin is identified on the label, then the 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.
- More information on the Buy American requirement as well as a suggested non-compliant tracking tool template can be found on the Buy American webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- Products without country of origin labels should also be tracked or verified through the distributor that they are indeed Buy American compliant. Products without country of origin label found onsite:
 - Uncle Ben’s Brown Rice
 - GFS Sweet and Sour Sauce
 - Red Gold BBQ Sauce
 - V-Blend juices
 - Silver Source Apples
 - Frozen mixed vegetables
 - Dannon yogurt
 - Gordon Choice Instant Mashed Potatoes
 - Gordon Choice Dill Pickle Spears

Reporting and Recordkeeping

Records have been kept on file for 3 years plus the current.

5. OTHER FEDERAL PROGRAMS REVIEWS-NOT APPLICABLE TO SFA

Corrective Action Needed

1. MEAL ACCESS AND REIMBURSEMENT

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ **Finding #1:** One household was issued incorrect benefits.

Corrective Action Needed #1: Send the households the [adverse action](#) letter. 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. **Completed on site. No further action required**

Findings and Corrective Action Needed: Verification

❑ **Finding #2:** Four applications were verified. Three of the households went back to a paid status. One household kept the same benefits but should have went back to a paid status.

Corrective Action Needed #2: Send the household the [adverse action](#) letter. 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. **Completed on site. No further action required**

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ **Finding #3:** During breakfast service at Blakewood, the point of service in some of the classrooms was unorganized. Students took the meal without a milk and then sat down. Students collected the milk for each classroom and mixed the counts up. They had to go back and gather the right milk. The teacher started taking meal counts before all the students were able to take their milk. Without the milk, students had a non-reimbursable meal. Students must have a full reimbursable meal before they can be counted and claimed for that meal.

Corrective Action Needed #3: Submit a statement on how the point of service will be cleaned up during breakfast service at Blakewood.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Finding #4: Lunch Signage. Signage helps students understand what components make up a reimbursable meal, and your signage was very impressive! However, the current signage states “pick 3” [meal components]. OVS is being implemented properly and students are not limited to three components. Signage should reflect that students must select **at least** three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination, and that they have the option to select more, up to all five components.

Corrective Action: Finding #4 None needed - fixed onsite.

Finding #5: Breakfast Signage. Signage must be posted and visible to all students indicating the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable. The breakfast signage must list the three components and the four items offered, and must communicate to students that under OVS, they must select at

least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination.

Corrective Action: Finding #5 Send a picture of posted breakfast signage.

Finding #6: Printed Menu Errors. The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on some menus. It may either be listed daily or in one place on the menu and include a statement that says that as a variety of milk offered daily as part of the reimbursable meal.

Corrective Action: Finding #6 None needed - fixed onsite.

Finding #7: CACFP - Family Style Meal Service. Family style meal service is being implemented improperly. During onsite observation, food was not on the tables but was instead walked around by aides offering the food to the students. Food should be available on the table and children should be given the option to serve themselves. If, instead, children are served pre-plated meals, children must be provided with the minimum serving of each component.

Corrective Action: Finding #7 Submit a written statement detailing how the SFA will start implementing Family Style Meal Service correctly.

Finding #8: Inadequate quantity of fruit prior to beginning of lunch meal service. Satellite kitchen prep staff were not properly portioning some fruit (strawberries) during onsite observation. TA given onsite and portions were fixed prior to service so that all meal components were served in the creditable amounts as menued by the menu planner and needed for reimbursable meals. Prep and portioning information needs to be clearly communicated to staff. Given the current processes in place at SMSD and discussions with the FSD, this will be most realistically accomplished via updating the standardized recipes that go to each school to include specific information on portioning instructions; however, the SFA may opt to solve this issue in other manners.

Corrective Action: Finding #8 Submit a written statement detailing how this issue will be avoided in the future.

Finding #9: Inadequate quantity of fruit prior to beginning of breakfast delivery. BIC delivery-trays were not prepared in such a way that each student had access to the full 1.0 cup of fruit as required by the meal pattern and as menued by the menu planner on day of observation. TA given onsite and portions were fixed prior to service so that all meal components were served in the creditable amounts as menued by the menu planner and needed for reimbursable meals.

Corrective Action: Finding #9 Submit a written statement detailing how BIC fruit quantity shortages will be avoided in the future.

3. RESOURCE MANAGEMENT –NO FINDINGS

4. GENERAL PROGRAM COMPLIANCE

Findings and Corrective Action Needed: Professional Standards

Finding #10: Professional standards training hours were being tracked individually by each staff member. SFA should have a central tracker listing each employee’s date of hire, required hours needed, hours completed and date of completion.

Corrective Action Needed #10: Submit a statement on how the SFA will track professional standards moving forward.

Findings and Corrective Action Needed:

5. OTHER FEDERAL PROGRAMS REVIEWS-(NOT APPLICABLE TO SFA)

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 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>).

