Documents were very well organized. With few exceptions, records were complete and included required documentation. Suggestions and recommendations were accepted well with plans for implementation.

SFS employees were very professional and there was a healthy interaction with the students.

The Food Service Director (FSD) was very cooperative and initiated some corrections on the day of the review.

The dining area was conducive to students eating well. Pleasant social interaction was observed among the students. The staff was friendly and helpful to the students.

There is a strong effort to follow all USDA and WI rules and regulations. The FSD was very interested in obtaining all the information she could about the Administrative Review.

The school was very quiet during the school day. It was very conducive to a good learning environment.

It was suggested to the FSD and the kitchen staff to brush up on menu planning even though they have a joint agreement for their meals.

There is a wealth of training on the internet where much information can be obtained. Training comes in many forms and from different websites. Examples were given.

Forms are designed with a purpose and should be completed as prescribed (i.e., all columns and rows should be answered if it pertains to your program). If there is uncertainty, DPI is there to assist. The SFA made very good use of the reviewer while on site for technical assistance.

Menu Review- Technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.

Resource Management - NonProgram Food Revenue
It was suggested that the SFA separates the deposits received for adult meals from reimbursable meal sales. Adult meals are considered nonprogram foods, and should be tracked separately from program sales. Ideally the SFA would have separate revenue accounts in their general ledger to easily track nonprogram and program sales. The SFA is already doing this with extra milk sales, and could add another revenue account for adult meal sales.
Date Corrective Action Plan was provided to SFA: 3/17/2017

Due Date for Corrective Action Plan: 4/14/2017

The following pages address the findings that were identified during your Administrative Review. For each finding you will be presented with the following:

The finding, and details specific to the SFA regarding the finding
The Code of Federal Regulations citation number or alternate resource citation

A summary of the regulation / requirement
Suggested guidance for the SFA in order to achieve compliance
SFA area for reply to state how, when and by whom corrections will be made

Please provide a detailed response to each finding in the spaces provided.

<table>
<thead>
<tr>
<th>Finding #1</th>
</tr>
</thead>
<tbody>
<tr>
<td>410. For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 9 ounce equivalent meat/meat alternate.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Technical Assistance Provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirement for meat/meat alternates required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <a href="http://healthymeals.nal.usda.gov/">http://healthymeals.nal.usda.gov/</a></td>
</tr>
</tbody>
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<thead>
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<th>Regulation / Citation and Summary</th>
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<tbody>
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<td>210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: minimum of 9 oz. equivalent of meat/meat alternate per week.</td>
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<th>SFA Suggested Guidance for Compliance</th>
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During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

SFA Response

Finding #2

410. For the week of menu review, the K-8 lunch menu did not meet the minimum daily requirement of 1 ounce equivalent grain. A grain was provided, however the mini corn dogs served on Monday were not Whole Grain Rich.

Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

Regulation / Citation and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: 1 oz. equivalent daily grain.

SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include: a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #3

410. For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent grain.

Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

Regulation / Citation and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: minimum of 8 oz. equivalent of grains per week.

SFA Suggested Guidance for Compliance
Finding #4

210.10(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent grains FNS guidance. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched.

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #4

410. For the week of menu review, the K-8 lunch menu did not meet the 100% Whole Grain Rich requirement for grains. Not all grains provided were Whole Grain Rich. The mini corn dogs served on Monday, were not Whole Grain Rich.

Technical Assistance Provided

During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. http://healthymeals.nal.usda.gov/menu-planning/whole-grains

Regulation / Citation and Summary

210.10(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent grains FNS guidance. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched.

SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance with the Whole Grain Rich requirements. The plan should include: a statement that only Whole Grain Rich grain products will be used as part of the reimbursable meal, a statement that all labels/recipes/manufacturer statements will be kept on file to document the Whole Grain Rich compliance, and a statement that additional menu training will be provided to SFA staff. Provide the outline for the training and the dates that the training(s) will be completed. In the plan include the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. In addition to the plan please submit a revised menu from the week of review that clearly identifies the products that have been changed to bring the menu into compliance, submit any needed supporting documentation such as labels, recipes, and/or manufacturer statements.

### Finding #5
The SFA has not performed SFSP outreach.

#### Technical Assistance Provided
It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.

#### Regulation / Citation and Summary
210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.

#### SFA Suggested Guidance for Compliance
To come into compliance with this requirement, the SFA must submit an assurance to the State Agency that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.

### Finding #6

#### SFA Response
Resource Management – Adult Meals
The SFA priced adult meals below the cost of producing these meals.

Technical Assistance Provided
The SFA has not sufficiently priced their adult lunches. Adult meals must be priced at least at the student price plus per-meal reimbursements and the value of commodities received. In the review year, the SFA priced adult lunches at $3.25, but should have charged at least $3.33 ($2.70 student price + $.35 federal reimbursement + $.2375 value of commodities + $.0469 state reimbursement). This year, the SFA should have charged at least $3.44, but only charge $3.35. The DPI Adult Meal Memo was sent to the SFA in an email. This memo, along with updated reimbursement rates and the value of commodities can be found on DPI’s Financial Management website: https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial

Regulation / Citation and Summary
FNS Instruction 782-5: Pricing of Adult Meals in the National School Lunch And School Breakfast Programs "Breakfasts and lunches served to teachers, administrators, custodians and other adults must be priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) is sufficient to cover the overall cost of the lunch. Including the value of any USDA entitlement and bonus donated foods used to prepare the meal. If cost data are not available, the minimum adult payment should reflect the price charged to Students paying the school’s designated full price, plus the current value of Federal cash and donated food assistance (entitlement and bonus) for full price meals. In nonpricing programs, the adult charge should be at least the amount of reimbursement received for a free lunch under Section 4 and 11 of the National School Lunch Act, plus the per-meal value of both entitlement and bonus donated foods, or for breakfasts, the rate established for free meals under Section 4 of the Child Nutrition Act, plus the value of bonus commodities."

SFA Suggested Guidance for Compliance
As the corrective action response, provide documentation showing that adult meal prices have increased as required, or show how the SFA is using non-federal funds to make up for the adult meal price deficiency. Explain the process that will be put into place to ensure that an adult meal pricing policy is established and reviewed annually. This pricing policy should establish guidelines for determining the cost of adult meals and document any sources of revenue designated specifically for the support of adult meals if the adults will be undercharged.

SFA Response