

**Administrative Review Summary Report  
Technical Assistance and Corrective Action Plan**

---

**Agency Code:** 40-8123      **School Food Authority:** Bruce Guadalupe United Community Center

**School(s) Reviewed:** Bruce Guadalupe Community School

**Review Date(s):** November 15-17, 2016      **Date of Exit Conference:** November 17, 2016

---

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 School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations that may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrative corrective action was completed are specified.

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you for the efforts on the Administrative Review process and support of child nutrition programs. The food service manager provided meal pattern review materials on time and very well organized, which helped to expedite the review process. It is clear that work is being done to ensure compliance with meal pattern requirements and that students are receiving nutritious meals. Thank you also to all of the kitchen staff and teachers for their hard work. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

Strong efforts are being made to plan and implement meals which meet USDA meal pattern requirements and food service staff have been very open to suggestions on ways to bring meals into compliance. The cafeteria is a classroom where students learn eating behaviors which can last a lifetime. We want to thank everyone involved for their commitment to child nutrition efforts.

**Technical Assistance/Program Requirement Reminders**

The School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement and many other topics. More information can be found on our training page, along with other upcoming trainings and webinars at: <http://dpi.wi.gov/school-nutrition/training>.

Consider pursuing a GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>.

SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources and best practices may be found on the SNT website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". 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 <http://dpi.wi.gov/statesupt/agenda-2017>.

## **Review Areas**

### **1. Meal Access and Reimbursement: Certification and Benefit Issuance, Verification, Meal Counting and Claiming**

#### **Comments/Technical Assistance/Compliance Reminders**

##### Certification and Benefit Issuance

- 522 eligibility determinations were reviewed, only 2 errors were identified.

##### Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, you should not convert it to annual, but using the Income Eligibility Guidelines (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility-guidelines-1617.doc>), you would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss.
- When benefit's eligibility status increases, the change must take place within 3 days. When benefit's eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action must be sent in writing with appeal rights procedures.

##### Zero Income

- Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies that there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

##### Household Size Box

- As a reminder, for the household income size box:
  - If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.
  - If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional office, any application that does not have this box completed is considered an incomplete application.

### Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including email. The determining official should document the details of the conversation, date, and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

### Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- LEAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian.
- The FNS website offers the application materials in 49 languages <http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.
- The nonprofit food service account may be used to pay for translation services for food service purposes if there is a need to translate materials in a language that is not currently available.

### Annual Income

- If the household provided only annual income, the LEA must follow up with the household to ensure that the amount is an accurate reflection of the household's current income.

### Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

### Application forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

### Transferring Students

- When a child transfers to a new school within the same 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 when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

### Effective Date of Eligibility

- School Districts may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is received. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at [karrie.isaacson@dpi.wi.gov](mailto:karrie.isaacson@dpi.wi.gov) for more information and approval.

### Direct Certification

- As a reminder, you are required to run direct certification minimum of three times a year: at or near the beginning of the school year, three months after the initial run (November) and six months after the initial run (February).
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

### Disclosure

- The information provided by families 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. Consent must be obtained each school year. A template sharing information form is located on the SNT webpage <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.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. A template disclosure form is located on the SNT website <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.

### Verification

- When applications are chosen for verification, the person designated as the Confirming Official should be reviewing these applications prior to contacting the family to ensure the initial determination is correct. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.

### Meal Counting and Claiming

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for consolidation.
- Meals must be offered to all students each day school is in session a full day, so DPI has posted a Field Trip resource page on our website to help schools offer a meal to students found under NSLP, then meal planning. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/field-trip-meals-templates.doc>
- The meal counting and claim was conducted perfectly.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

## **Findings and Corrective Action Needed**

### Certification and Benefit Issuance

- **Finding #1:**  
Student listed on the SFA-1 statistical sample form are incorrectly certified for meals.

Two household applications were incorrectly determined to have free meal benefits when they should have been determined to have reduced price meal benefits.

**Corrective Action Needed:**

A ten day notice of adverse action must be sent to these households informing them they will have reduced price meal benefits.

Verification

**Finding #1:**

Verification activities were not completed by the November 15<sup>th</sup>. Verification is considered complete when determination has been determined if the household remains at the same meal benefit status or the letter of adverse action has been sent. The determination had been made by November 15<sup>th</sup> but the letters of adverse action still needed to be sent.

**Corrective Action Needed:**

Provide a written statement verification activities will be completed by November 15<sup>th</sup> each school year and when these letters of adverse action have been sent for this school year.

**2. Meal Pattern and Nutritional Quality: Meal Components and Quantities, Offer versus Serve, Dietary Specifications and Nutrient Analysis**

**Comments/Technical Assistance/Compliance Reminders:**

Meal Components and Quantities

Food manufacturers are continually reformulating products used in schools. It is important to stay current with these changes and be confident the documentation on file matches the products in stock. It is strongly recommended to maintain and organize this information in a manner that is easy to reference and update, such as a binder or file folders divided into categories. These records should be reviewed and updated at least annually and as new products are purchased or substituted.

Items which are not processed prior to purchase, such as raw meats, beans, eggs, fruits, vegetables, and milk, can be credited using the USDA *Food Buying Guide* (FBG). It is important to note that the FBG has been updated to reflect changes made with the new meal pattern. The print edition that was sent to schools has not been updated and is currently out of date. For the most accurate information, view or print the FBG sections at <http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>. Foods that do not have a standard of identity (with the exception of fresh fruits and vegetables) are not listed in the FBG and require further documentation such as a Child Nutrition (CN) label or a product formulation statement (PFS) clearly detailing the ingredients and their creditable quantities in order to be served in child nutrition programs.

Apples were listed on production records crediting as ½ cup and bananas were recorded as crediting as 1 cup. Per the Food Buying Guide (FBG), a 125-138 count apple will credit as 1 cup of fruit and most bananas will credit as ½ cup fruit. Check which products you are using and confirm crediting using the FBG.

Leafy greens credit for half the volume served in their fresh form. For example, a ½ cup of fresh baby spinach would credit 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 dark green vegetables are cooked, such as steamed spinach, they can credit as the actual volume served.

All grains crediting toward meal pattern requirements in the National School Lunch and School Breakfast programs are required to be whole grain-rich. Grains that are not whole grain-rich cannot be credited toward the grain component. Some of the grain products currently in use are not whole grain-rich include the Alpha Bakery bread and the Golden Home Bakery dinner rolls. USDA has a Whole Grain Resource that provides tools and tips for identifying whole grain-rich products, which is available at <http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>.

Production records should be a useful tool for the menu planner and kitchen staff. Information should be recorded during the planning process, during prep, before service, and after service. Production records do not need to be re-typed after service. Staff should be recording actual quantities of food prepared and using standardized recipes to ensure proper crediting. Remember to record condiment and milk usage on production records. This was recorded on some days but not all days during the review week. As a reminder, all food items offered with the reimbursable meal must be recorded on production records. A list of “must haves” for

production records can be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-must-have.pdf>.

#### Dietary Specifications and Nutrient Analysis

Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. The USDA quantity recipes are not considered standardized until you update them to reflect actual products used. Note that Beefy Mac and Cheese recipe and the Lasagna recipe both call for enriched pasta but whole grain-rich pasta was observed onsite. These recipes must be updated with the current product and any yield difference noted. Make sure to re-credit the recipes if there are yield differences. Use the resources on the DPI website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These resources are found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>. Make sure to also check out USDA's What's Cooking website at <https://www.whatscooking.fns.usda.gov> where you can search for quantity recipes.

Signage must be posted that indicates how to create a reimbursable breakfast and a reimbursable lunch. Resources for signage can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>. Free posters and other materials can be ordered by completing the order at [https://docs.google.com/forms/d/1rIGjKHSxkmtYtYsl4GuRiXL3NK3tEoZ-8JT-G9RKbgl/viewform?edit\\_requested=true](https://docs.google.com/forms/d/1rIGjKHSxkmtYtYsl4GuRiXL3NK3tEoZ-8JT-G9RKbgl/viewform?edit_requested=true). Make sure to post lunch signage in the separate room where K3 students are served.

#### Offer versus Serve

Your school has chosen to not use Offer Versus Serve (OVS). OVS is not required for grades K3-5 at breakfast or lunch, although it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, students must be served  $\frac{3}{4}$  cup vegetable and  $\frac{1}{2}$  cup fruit to create a reimbursable meal. If OVS is implemented, then students have the option to choose three of the five offered components and only need to select  $\frac{1}{2}$  cup fruit, vegetable, or combination of fruit and vegetable to create a reimbursable meal. This can reduce food waste, reduce the cost of meals, and increase student satisfaction as they are able to select the items they want. Students that have selected food items for themselves are more likely to eat those items and having less food on the tray can be less intimidating for younger students, which may encourage them to eat more. OVS resources for lunch can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>. Resources for breakfast can be found at <http://dpi.wi.gov/school-nutrition/school-breakfast-program/menu-planning>. You can also find a training webcast at <http://dpi.wi.gov/school-nutrition/training/webcasts#ovs>.

Review portion control with servers. It was observed some staff used heaping scoops rather than level scoops. Serving more food than planned increases the dietary specifications of meals (calories, saturated fat, sodium) and can lead to a food shortage as more food is served than was planned. Check out the webcast on portion control at <http://dpi.wi.gov/school-nutrition/training/webcasts#pc>.

As discussed, food items located past the final person checking trays for compliance do not credit toward meal pattern compliance but do still add calories, saturated fat, and sodium. It is recommended to move food items like the dinner rolls served on 11/16/16 to a spot before the point of service.

#### **Findings and Corrective Action Needed:**

##### Meal Components and Quantities

###### **Finding #1:**

During the review week of October 3-7, 2016, only  $\frac{1}{2}$  cup of fruit was offered to students each day at breakfast per the production records.

###### **Corrective Action Needed:**

Technical assistance on this was provided prior to the onsite review. This was corrected and 1 cup of fruit was offered to students at breakfast during the breakfast observation on November 16, 2016. Staff confirm that 1 cup of fruit will continue to be offered. **No further corrective action is needed.**

### Dietary Specifications and Nutrient Analysis

#### **Finding #1:**

Vegetable quantity requirements at lunch were not met on one day during the review week. As a reminder, leafy greens credit for half the volume served. On November 5, ½ cup of lettuce was offered to students, which credits as ¼ cup vegetable. There were no other vegetables menued and there was not enough creditable vegetable in the lasagna to meet the ¾ cup daily vegetable requirement for lunch.

#### **Corrective Action Needed:**

Submit a written statement explaining how vegetable requirements will be met the next time lettuce is offered by December 23, 2016.

#### **Finding #2:**

Grain requirements were not met during the review week due to non-whole grain-rich products. Product information supplied for the cheese pizza served during the review week indicates that it was not whole grain-rich. Note that the first ingredient was enriched flour instead of a whole grain ingredient. The information provided was a product spec sheet and not valid crediting documentation. If using a CN labeled product, keep the CN label for documentation. If using a cheese pizza that is not CN labeled, request a Product Formulation Statement (PFS) from the manufacturer. Cheese pizza was not observed onsite in the freezer. It was observed onsite that the Golden Home Bakery dinner rolls offered at lunch were not whole grain rich as the first ingredient was “bleached wheat flour.” While these rolls are technically made with whole grains, the processed flour outweighs the whole grain flour. The Alpha Bakery Pullman Wheat Bread (12613) in storage is also not whole grain-rich as “enriched wheat flour” is the first ingredient. Note that product information for a whole grain-rich bread from Alpha Bakery (12722) was submitted for the review week.

#### **Corrective Action Needed:**

Submit product information and crediting documentation for the cheese pizza that will be used moving forward. Submit production information for the bread and dinner rolls that will be used moving forward by December 23, 2016.

#### **Finding #3:**

Signage was not posted for breakfast. Refer to the technical assistance section of this report for free signage resources.

#### **Corrective Action Needed:**

Submit a written statement confirming that breakfast signage has been posted by December 23, 2016.

### **3. Resource Management: Risk Assessment and Comprehensive Review of Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Non-program Foods, Indirect Costs**

#### Comments/Technical Assistance/Compliance Reminders

#### Nonprofit School Food Service Account

- How to locate the agency’s Child Nutrition program Report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, was reviewed with (insert name). We also reviewed how to access the Aids Register, to track all program deposits made to the agency’s account. The Aids Register also shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. Both resources are accessible from our Online Services webpage: <http://dpi.wi.gov/nutrition/online-services>.

#### Annual Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its “yearly” reference period for non-program food compliance which is highly recommended. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.

- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.
- Items noted during the review of the AFR that should be addressed when tracking revenues and expenditures moving forward 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” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “Ala Carte”, you should be reporting 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 would also be included here.
  - When revenues are recorded from the federal reimbursement payments, you want to 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 a food expenditure.

#### Allowable costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.

#### Revenue from Non-program Foods

- **Non-program Foods Revenue Rule SP-20-2016** <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
  - Non-program Foods in a nutshell <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
  - Non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
  - All non-program food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
  - Non-program Food costs and revenues must be separated from Program Food costs and revenues.
  - The USDA Non-program Revenue Tool must be completed yearly, at a minimum. The DPI Non-program Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of non-program foods and meeting the USDA non-program food regulation <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>.
  - SFAs that sell **only non-program milk** and **adult meals** as non-program foods are exempt from completing the USDA Non-program Food Revenue tool <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>.
  - Adult meals are considered non-program foods. Food service programs must price adult meals

above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) should be used to determine 2017-18 SY prices since rates aren't released until July 1 of each year.

### **Findings and Corrective Action Needed:**

#### **Risk Assessment for Resource Management**

##### **❑ Finding #1:**

Expenses and revenues for the National School Lunch Program (NSLP) are being recorded but not all of them in one general non-profit school food service account.

Some of the expenses not reported are:

- One Half of the cost for two secretarial staff involved with the NSLP
- The cost of processing and delivery of USDA Foods

Some of the revenues not reported are:

- The total cash deposits from parents for paid lunches
- A transfer from the general account into the non-profit food service account for the free meals teacher are provided

##### **Corrective Action Needed:**

Written statement all expenses and revenues for the NSLP will be compiled in a general ledger account to correctly reveal the profit and loss of the NSLP by December 23, 2016.

#### **Comprehensive Review- Revenue from Non-program Foods**

##### **❑ Finding #1:**

The non-program revenue tool was not completed for one week (5days)

##### **Corrective Action Needed:**

Submit a completed non-program revenue tool by December 23, 2016

#### **4. General Program Compliance: Civil Rights, On-site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in Schools, Professional Standards, Water, Food Safety, Storage and Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach**

##### **Comments/Technical Assistance/Compliance Reminders:**

#### **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 just updated in October 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, the abbreviated statement may be used, "**This institution is an equal opportunity provider,**" so that it can be printed in the same size font as the other printing in the document.

##### **And Justice for All Poster**

- We appreciated the lunch room area had the food safety inspection and the new "And Justice for All" posters posted on the cafeteria wall so the public can read the information.

##### **Civil Rights Training**

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

##### **Civil Rights Self-Compliance Form**

- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually.

### Special Dietary Needs

- Special dietary accommodations were discussed. If providing a fluid milk substitute for students who are lactose intolerant, it cannot be juice, unless based on a documented disability by a medical practitioner. Water is available to all students, a lactose free milk could be offered or you can provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide us the nutritional panel from the product you will be using. For more information on fluid milk substitutes, <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- All food substitutions for children with disabilities must be documented by a licensed medical professional. We have a prototype Medical Form posted on our website that is also available in Spanish and Hmong that you can use [http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special\\_dietary\\_requests\\_form.pdf](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special_dietary_requests_form.pdf). When the form is completed indicating that the special dietary request is based on a disability, the school is required to provide a meal that meets the child's needs as documented. The meal would not have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child. 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>.
- School food service staff may make food substitutions, at their discretion, for individual children who do not have a disability. The school must still have a completed Dietary Request Form on file from a medical authority (could be a school nurse) certifying the student as having a special medical or dietary need. Such determinations are only made on a case-by –case basis and all accommodations must be made according to the USDA's meal pattern requirements in order to claim.
- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow's milk and pre-approved through DPI. 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, which allows juice as a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use. See SP 07-2010 <http://www.fns.usda.gov/qas-milk-substitution-children-medical-or-special-dietary-needs-non-disability> for more information.

### Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. The form to assist in filing these complaints can be found on the DPI SNT website at [https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)

### On-site Monitoring

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.
- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more

information see USDA memo SP 56-2016 <http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.

- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> under the SFA onsite monitoring section.

### **Local Wellness Policy and School Meal Environment**

- Under the Healthy Hunger-free Kids Act of 2010, all School Food Authorities are required to have a written Local Wellness Policy (LWP) and have an active Wellness Committee. Information on school wellness policies may be found on our website at <http://dpi.wi.gov/school-nutrition/wellness-policy>.
  - LWPs should include language related to nutrition education, nutrition promotion, and nutrition guidelines available for all foods on campus, physical education, and physical activity.
  - SFA must inform the public about the content of the local school wellness policy (LWP) and retain documentation regarding the notification.
  - SFA must review and update local school wellness policy (LWP) on a periodic basis (recommended annually) and retain documentation demonstrating how this requirement is met.
  - SFAs must permit parents, students, physical education teachers, school health professionals, school administrators, school board representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the local school wellness policy (LWP). SFA wellness committees should include a diverse team of committed school and community stakeholders. SFAs are required to actively seek members for the wellness committee that represent each of the above categories and retain documentation that all have been notified of participation availability.
  - The SFA must conduct an assessment of the implementation of local school wellness policy (LWP) every 3 years. SFAs are required to retain a copy of the assessment on file. The assessment should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. *Implementation-Monitoring Plan* template has been developed to assist SFAs to assess their LWP progress. This is found on page 43 of the *Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit* ([http://fns.dpi.wi.gov/fns\\_wellnessplcy2](http://fns.dpi.wi.gov/fns_wellnessplcy2)).
  - SFA is required to inform and update the public (including parents, students, and others in the community) about the assessment of the implementation of (LWP). SFAs are required to retain a copy of the assessment and documentation regarding the public notification.

### **Smart Snacks in Schools**

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalizes science-based nutrition guidelines for competitive foods sold on the school campus during the school day that were established in the Interim Final Rule (July 1, 2014). Foods and beverages sold in schools must meet both the general standards and the nutrient standards outlined in the final rule if they do not qualify for an exemption.

Your school has indicated that you do not sell food to students during the school day. You have indicated that you do not provide a la carte foods and do not have a school store, coffee stand, vending machines, or a snack cart. Fundraisers do not sell food during the defined school day. Some of the new requirements are:

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new "Smart Snacks" regulation that is effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-

wide to assure compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

**Professional Standards**

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The hiring standards for SFA directors are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements <http://dpi.wi.gov/sites/default/files/imce/school-: nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>.
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Training obtained since April 1, 2015 may count towards training requirements. 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, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.
- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

<b>Directors</b>	<b>Managers</b> (20 hrs. or more/week)	<b>Other Staff</b> (less than 20 hrs./week)	<b>Part Time Staff</b>
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
<b>8 hours</b>	<b>6 hours</b>	<b>4 hours</b>	<b>4 hours</b>
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
<b>12 hours</b>	<b>10 hours</b>	<b>6 hours</b>	<b>4 hours</b>

**Water**

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

## Food Safety, Storage and Buy American

### Food Safety Inspections

- Every school operating USDA School Child Nutrition programs, must have two food safety inspections during each school year, one in the fall of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site's Food Safety Plan.
- The most current Food safety inspection report was posted in public view.

### Temperatures

- All pieces of cooling equipment must have the internal temperature taken and recorded daily on a temperature log. Having them posted right on the actual piece of equipment makes recording convenient and top of mind.

### Food Safety Plans

- The Food Safety Plan was available for review. It was obvious through observation foodservice is very knowledgeable about food safe handling practices. All temperature logs, calibration logs and sanitizing solution logs were up to date.
- All schools must have a comprehensive site-specific food safety plan on site which includes all process 1, 2, and 3 items, all standard operating procedures (SOP) for each individual site, all equipment, and food service staff and be reviewed yearly. Updated prototype food safety plan templates and SOPs may be found at our website under <http://dpi.wi.gov/school-nutrition/food-safety#fsp>.
- SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria, as applicable.
- All food service employees must have a signed Employee Reporting Agreement on file.

### Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. It was very apparent additional freezer space is needed as it was impossible for me to step into the freezer. Granted the USDA Foods order for the month was just received but staff are not able to work within the freezer without removing items in order to see what is available on the sides and back of the freezer.

### Time as Public Health Control

- When using "Time as a Public Health (Temperature) Control":
  - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
  - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
  - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees F., or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all left over TCS foods must be discarded.

Must be kept above 135 on hot line with mechanical heat	Must be kept under 41 degrees with mechanical refrigeration
Animal protein – eggs, meat, chicken, fish, shellfish, etc	Milk and cheese, including house made dressing made with milk
Tofu and soy products –texturized vegetable protein, hot edamame	Hard boiled eggs
Baked potatoes	Tofu, edamame, soy
Heat-treated plant food, such as cooked rice, beans, vegetables	Sliced melons, cut leafy greens, cut tomatoes
Anything with cheese	Untreated garlic-and-oil mixtures
	Sprouts

### **Buy American**

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. 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. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- 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.

### **Reporting and Recordkeeping**

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

### **SBP and SFSP Outreach**

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

### **Breakfast Promotion**

- The breakfast participation at Bruce Guadalupe Community School is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the Serving up a Successful School Breakfast Program guide: <http://dpi.wi.gov/school-nutrition/school-breakfast-program>.
- A Breakfast in the Classroom Toolkit is also available if that option is considered: [http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/BIC\\_Final-web.pdf](http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/BIC_Final-web.pdf)
- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children.

This video along with a brochure can be found on our website:

<https://www.youtube.com/watch?v=aHR7eECbKaE>

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- Cycle Menu Resources: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>
- School Breakfast Menus on the Web: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

### **Summer Meals**

- 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 Bruce Guadalupe Community School USDA would like 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](#) on the [DPI Summer Meals website](#)
  - 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 website <http://www.fns.usda.gov/summerfoodrocks>.
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

### **5. Other Federal and State Programs –Afterschool Snacks, Fresh Fruit and Vegetable Program, Special Milk Program, Wisconsin School Day Milk Program**

#### **Comments/Technical Assistance/Compliance Reminders:**

##### Afterschool Snacks

- Each site participating in the Afterschool Snack Program needs to receive a review within the first four weeks of operation, and a second review within the school year. The review form may be found on our website at <http://dpi.wi.gov/school-nutrition/after-school>.
- Area Eligible Afterschool Snacks are all claimed at the free rate.

#### **Findings and Corrective Action Needed:**

##### Afterschool Snacks

###### **Finding #1:**

The Point Of Service (POS) in the cafeteria for the Afterschool Snack Program is at the beginning of the line. Staff are unable to determine if a student takes the second item offered which was milk on the day of observation. Twenty-two students were observed in which the student did not include the second item which was milk.

###### **Corrective Action Required:**

Written statement as to how an accurate POS will be implemented at all locations snack are served by December 23, 2016.

## Administrative Review Corrective Action Summary

### Certification and Benefit Issuance

**Finding #1:**

Student listed on the SFA-1 statistical sample form are incorrectly certified for meals.

Two household applications were incorrectly determined to have free meal benefits when they should have been determined to have reduced price meal benefits.

**Corrective Action Needed:**

A ten day notice of adverse action must be sent to these households informing them they will have reduced price meal benefits by December 23, 2016.

### Verification

**Finding #1:**

Verification activities were not completed by the November 15<sup>th</sup>. Verification is considered complete when determination has been determined if the household remains at the same meal benefit status or the letter of adverse action has been sent. The determination had been made by November 15<sup>th</sup> but the letters of adverse action still needed to be sent.

**Corrective Action Needed:**

Provide a written statement verification activities will be completed by November 15<sup>th</sup> each school year and when these letters of adverse action have been sent for this school year by December 23, 2016.

### Meal Components and Quantities

**Finding #1:**

During the review week of October 3-7, 2016, only ½ cup of fruit was offered to students each day at breakfast per the production records.

**Corrective Action Needed:**

Technical assistance on this was provided prior to the onsite review. This was corrected and 1 cup of fruit was offered to students at breakfast during the breakfast observation on November 16, 2016. Staff confirm that 1 cup of fruit will continue to be offered. **No further corrective action is needed.**

### Dietary Specifications and Nutrient Analysis

**Finding #1:**

Vegetable quantity requirements at lunch were not met on one day during the review week. As a reminder, leafy greens credit for half the volume served. On November 5, ½ cup of lettuce was offered to students, which credits as ¼ cup vegetable. There were no other vegetables menued and there was not enough creditable vegetable in the lasagna to meet the ¾ cup daily vegetable requirement for lunch.

**Corrective Action Needed:**

Submit a written statement explaining how vegetable requirements will be met the next time lettuce is offered by December 23, 2016..

**Finding #2:**

Grain requirements were not met during the review week due to non-whole grain-rich products.

Product information supplied for the cheese pizza served during the review week indicates that it was not whole grain-rich. Note that the first ingredient was enriched flour instead of a whole grain ingredient. The information provided was a product spec sheet and not valid crediting documentation.

If using a CN labeled product, keep the CN label for documentation. If using a cheese pizza that is not CN labeled, request a Product Formulation Statement (PFS) from the manufacturer. Cheese pizza was not observed onsite in the freezer. It was observed onsite that the Golden Home Bakery dinner rolls offered at lunch were not whole grain rich as the first ingredient was "bleached wheat flour." While these rolls are technically made with whole grains, the processed flour outweighs the whole grain flour. The Alpha Bakery Pullman Wheat Bread (12613) in storage is also not whole grain-rich as "enriched wheat flour" is the first ingredient. Note that product information for a whole grain-rich bread from Alpha Bakery (12722) was submitted for the review week.

**Corrective Action Needed:**

Submit product information and crediting documentation for the cheese pizza that will be used moving forward. Submit production information for the bread and dinner rolls that will be used moving forward by December 23, 2016.

- **Finding #3:**  
Signage was not posted for breakfast. Refer to the technical assistance section of this report for free signage resources.  
**Corrective Action Needed:**  
Submit a written statement confirming that breakfast signage has been posted by December 23, 2016.

Risk Assessment for Resource Management

- **Finding #1:**  
Expenses and revenues for the National School Lunch Program (NSLP) are being recorded but not all of them in one general non-profit school food service account.  
Some of the expenses not reported are:
  - One Half of the cost for two secretarial staff involved with the NSLP
  - The cost of processing and delivery of USDA Foods
 Some of the revenues not reported are:
  - The total cash deposits from parents for paid lunches
  - A transfer from the general account into the non-profit food service account for the free meals teacher are provided**Corrective Action Needed:**  
Written statement all expenses and revenues for the NSLP will be compiled in a general ledger account to correctly reveal the profit and loss of the NSLP by December 23, 2016.

Comprehensive Review- Revenue from Non-program Foods

- **Finding #1:**  
The non-program revenue tool was not completed for one week (5days)  
**Corrective Action Needed:**  
Submit a completed non-program revenue tool by December 23, 2016

Afterschool Snack Program

- **Finding #1:**  
The Point Of Service (POS) in the cafeteria for the Afterschool Snack Program is at the beginning of the line. Staff are unable to determine is a student takes the second item offered which was milk on the day of observation. Twenty-two students were observed in which the student did not include the second item which was milk.  
**Corrective Action Required:**  
Written statement as to how an accurate POS will be implemented by December 23, 2016.

---

As discussed at the exit conference, it is understood that prompt corrective action is required for the findings identified above. Part 210.08 of federal regulations requires fiscal action to be calculated for critical violations to reclaim of unearned reimbursement. In addition, withholding of program payments is required if documentation of corrective action is not received within 30 days of the date negotiated at the exit conference, or as later extended upon written request if extraordinary circumstances delay completion of corrective action within the originally negotiated timeframe. Uncorrected errors are subject to reclaim for the entire school year.

Section 207 of the Healthy Hunger Free Kids Act amended section 22 of the NSLA (42 U.S.C.1769c) to require State agencies to report the final results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. The final rule at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency's publicly available website, and the SFA is strongly encouraged to post a summary on the SFA's public website. A summary of this review will be made publicly available on the SNT website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> within 30 days of the SFA receiving the final AR report.

---

Signature of Authorized Representative

11/17/2016  
Date of Exit

December 23, 2016  
Negotiated Corrective Action Date

---

**Signature of Food Service Director**

---

**Signature of Nutrition Program Consultant**

---

**Signature of Public Health Nutritionist**

