

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

School Food Authority: Academy of Excellence

Agency Code: #40-9870

School(s) Reviewed: Wind Lake H.S.

Review Date(s): March 20-21, 2018

Date of Exit Conference: March 21, 2018

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

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

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. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, 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, or 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 (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and 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.
- [Fresh Fruit and Vegetable Program](https://dpi.wi.gov/school-nutrition/ffvp), (FFVP) grants are provided annually by USDA (<https://dpi.wi.gov/school-nutrition/ffvp>). The program provides a non-mealtime fresh fruit or vegetable snack to all children in elementary schools.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at the Wind Lake High School for the courtesies extended to us during the on-site review and for being available to answer questions and provide 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. The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet school nutrition program regulations.

Academy of Excellence does an excellent job of managing program regulations Overall this was a very nice review. The Food Service Director is conscientious and staff are well trained and enjoy their roles in providing nutritious meals to students. Everyone involved should be commended for their work to support student learning through USDA's child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Community Eligibility Provision (CEP)

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- [USDA Community Eligibility Provision guidance](#) has been expanded in memo SP 54-2016 (www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) to allow for the use of one form for both meal eligibility and as an alternative household form to be used in CEP schools. This may alleviate confusion among households and administrative staff at a mixed district. This memo clearly outlines the requirement to cost-allocate expenses back to the district for processing and distributing forms in CEP schools. CEP applications and labor hours involved with processing them cannot be paid for from the nonprofit school food service account.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

We extend sincere appreciation to the FSD at Academy of Excellence and vendor at Fresh & Safe. Thank you for the time, organization, and efforts that you have put into preparing for this review.

Comments/Technical Assistance/Compliance Reminders

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. Pre-kindergarten is exempt from the CACFP meal pattern *if* they are comingled with older students following the National School Lunch Program; *meaning that pre-k students can follow the NSLP meal pattern if they are served at the same time as older students and without distinction.* More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Contact Erin Opgenorth (erin.opgenorth@dpi.wi.gov) or Tanya Kirtz (tanya.kirtz@dpi.wi.gov) with any questions.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding: Standardized Recipes

A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. 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](#) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). Additionally,

- please record vegetable contribution by subcategory while rounding down to the nearest 1/8 cup
- keep in mind that the crediting has changed from 14.75 grams of creditable grain per serving to 16 grams of creditable grain per serving. When following the ingredient quantities listed in a USDA recipe, crediting information is not guaranteed to be current. For assistance in crediting grains/breads products, you can utilize the [USDA Whole Grain Resource](#) (<https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf>).

Corrective Action Needed: Please submit a standardized recipe for the following:

- Broccoli salad
- Macaroni salad
- Breakfast burrito

- Carrot-raisin salad
- Mexicali corn
- Gravy

❑ Finding: Crediting documentation

Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for School Meal Programs, it may not be credited when served as part of the USDA School Meal Programs. More information about crediting documentation can be found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Corrective Action Needed: Please submit current and accurate CN labels or PFS for the egg patty. Alternatively, submit nutrition information with a PFS or CN label for a new product, should it become necessary to discontinue use of the current product.

❑ Finding: Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Please remember to use volume measures (such as cups) to record portion sizes of fruits and vegetables, and use weight measures (such as ounces) to record portion sizes of meat/meat alternates and grains.

Corrective Action Needed: Please submit completed copies of breakfast and lunch production records for 3 consecutive days.

❑ Finding: Fruit Shortage

High school students must have 1 cup fruit offered to them at each meal. On the day of observation students could take ONE piece of fruit, OR 1 cup of mixed fruit. If a student selected a fresh orange, they only had access to ½ cup of fruit, which does not meet the daily minimum. Possible suggestions are to allow students to take multiple servings of fruit, or offer juice in addition to the fresh fruit.

Corrective Action Needed: Please submit a written statement explaining how a minimum of 1 cup fruit will be offered to all high school students at each meal. This will be verified upon review of completed production records.

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

3. RESOURCE MANAGEMENT

Annual Financial Report

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school

in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “nonprogram foods”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

Finding: On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category. Transfers were assessed to school lunch when the actual reported loss was in the breakfast program. Also it is important to assess program labor based on actual time rather than a 50% split of labor hours which doesn’t accurately assess accountability by program.

Corrective Action Needed: Please resubmit your 16-17 Annual Financial Report with revenues and expenses broken out by program and category. To do this, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update with a CC to Loriann, loriann.knapton@dpi.wi.gov.

SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at Academy of Excellent Windlake High School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

BUY AMERICAN

Comments/Technical Assistance/Compliance Reminders

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

The Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](#) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. More information on this new requirement, including a tool to assist with tracking

noncompliance products, can be found on the [SNT Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

□ Finding: Non-compliant items

The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Tomatoes- Canada
- Peppers- Guatemala
- Onions- Guatemala
- Snap peas- Guatemala
- Broccoli- Mexico
- Pineapple- Mexico

Corrective Action Needed: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A template form is located on the [procurement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure student success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!