

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

School Food Authority: Appleton Area School District Agency Code: 44-0147

School(s) Reviewed: Appleton Bilingual, Columbus Elementary, Appleton Tech, West High

Review Date(s): 11/26-28/18

Date of Exit Conference: 11/28/18

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. 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 along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff Appleton Area School District for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- Of the 4,707 students eligible for free or reduced price meals in October, a sample of 580 students was pulled for review, and all were approved correctly! Outstanding job!

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding #1:** The price being charged for a meal \$0.00, \$.40, \$2.95, showed up on the computer screen visible to staff and students, which results in overt identification, as students are able to tell another student's eligibility by what they are being charged for a meal.

Corrective Action Needed: Please program the register so the price does not show up via student eligibility and send a picture of the screen showing the change. **Completed. No further action required.**

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable, but these verifications are not considered part of the Verification sample. For more information, refer to the current [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Findings and Corrective Action Needed: Verification

- ✓ **Finding #1:** The SFA reported on their Verification Collection Report (VCR) that it had completed direct verification when it had not.

Corrective Action Needed: Please resubmit your VCR with the correct reporting numbers. **Completed on site. No further action required.**

- ✓ **Finding #2:** One verified application with 3 students was verified as reduced, but the income was over the reduced limit, so the household should have become paid.

Corrective Action Needed: Please notify this household of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-2** form and send completed copy as corrective action. **Completed on site. No further action required.**

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- DPI has created [Field Trip meal resources](#) to help schools offer student meals every school day. Field trip meals must be charged to the student at the time of delivery of the reimbursable meal. If students do not come to cafeteria to pick up field trip meals, they must be checked off as the student receives the meal.
- For FSMC operated districts, a SFA employee must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #1:** Free meal counts were transposed with the paid meal counts at Renaissance school on the October claim causing an over claim of 58 free meals and an under claim of 58 paid meals.

- Corrective Action Needed:** Please submit a statement that edit checks will be double checked before monthly claim submission
- ❑ **Finding #2:** Paid meals were over-claimed by 3 meals for Montessori Public on the October claim.
Corrective Action Needed: Please submit a statement that edit checks will be double checked before monthly claim submission
 - ❑ **Finding #3:** The Authorized Representative did not sign off on the edit checks before claim submission by a FSMC employee.
Corrective Action Needed: Please submit the November edit checks with SDA signature and provide a statement of understanding that all edit checks will be signed off on by a SFA employee before monthly claim submission.
 - ❑ **Finding #4:** Breakfast in the Classroom at Columbus Elementary School did not properly utilize check-off sheets as students were receiving the breakfast meal and some students took non-reimbursable meals due to an inaccurate point of service.
Corrective Action Needed: Please submit 30 days of clean counts to complete fiscal recalculation for the breakfast meals served at Columbus Elementary School for the months of September, October, and November.
 - ❑ **Finding #5:** There was no adult at the end of the line determining whether a reimbursable breakfast meal had been taken at Appleton Bilingual, which constitutes an inaccurate point of service.
Corrective Action Needed: Please submit 30 days of clean counts to complete fiscal recalculation for the breakfast meals served at Appleton Bilingual School for the months of September, October, and November.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all staff at Appleton Area School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. Thank you for sending complete and organized crediting documentation prior to the onsite review. This greatly expedited the review process.

All food service staff showed great dedication to the school meals programs and work hard each day to provide appealing meals for the students. Offering numerous entree options at lunch for all grades is a great way to drive meal participation and the cafeteria area at West High School and Appleton Technical Academy created an inviting atmosphere. Thank you for all that you do for the students of Appleton Area School District!

Comments/Technical Assistance/Compliance Reminders

Updating Crediting Documentation

Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. These records should be reviewed and updated at least twice per year and as new products are added to the menu.

Quantities at the High School

Students in grades 9-12 must be able to select the full 1 cup of fruit and full 1 cup of vegetables at lunch as part of a reimbursable meal. The signage posted could be misleading as it states that students will be charged for additional servings of items, but most fruits and vegetables are offered in ½-cup serving sizes. While it may be appropriate to limit the number of servings of fruits or vegetables with high

calories or sodium contents to meet the dietary specifications, students must be able to access a total of 1 cup of fruit and 1 cup of vegetable at each lunch.

There was also some confusion over what students may take for the meat/meat alternate component at the Green Street Deli on the day of lunch observation at West High School and Appleton Technical Academy. The menu planner had previously stated that students could select a combination of meats and/or cheeses to total 2 oz eq meat/meat alternate. However, the staff member working that station on the day of review stated students were not allowed to select two 1 oz eq meat servings. Additional communication is recommended between the menu planner and staff to ensure the menu is being offered as intended to meet meal pattern. Consider creating visuals or handouts (for staff and/or students) to keep at stations that explain how students may customize their foods while still meeting the requirements for reimbursable meals.

Standardized Serving Sizes

Serving sizes that have been weighed or measured ensure students receive the planned quantity of the food component (e.g., two ounce equivalents of grain) or nutrients. Some practices observed during the onsite reviews may affect the serving sizes offered, as well as meal pattern compliance.

- The vegetables portioned into ½-cup servings were not consistent and were not measured to ensure ½ cup of vegetable per serving (see Meal Pattern Finding #5).
- The rice offered at Columbus Elementary during lunch observation was served using a heaping spoodle.
- During lunch observation at West High School and Appleton Technical Academy, the shredded cheese offered in the Tortilla Fresh Mex line was not being measured at the beginning of service. This was corrected and did not result in non-reimbursable meals.
- During lunch observation at West High School and Appleton Technical Academy, the tortilla chips offered in the Tortilla Fresh Mex line were not being measured into the serving boat. Based on visual inspection and information from the product formulation statement, the number of tortilla chips in each boat was enough to credit as intended and did not result in non-reimbursable meals.

In addition to ensuring proper crediting, food costs are also controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting. When it is not reasonable to measure or weigh every serving during meal service, you may measure or weigh one serving prior to service as a visual reference for the correct serving size. For example, the amount of chips to credit as the intended 2.25 oz eq grain could be weighed prior to service and put into the serving boat. All servings offered during lunch could then be portioned based on that reference serving.

Dietary Specifications

The grain quantities offered at lunch during the week of review at all review sites were notably in excess of the weekly maximums. While the weekly grain maximum ounce equivalents are only recommended targets, it can be difficult to meet the dietary specifications if the menu is consistently exceeding these targets. As discussed, continue to work to bring the offered amounts closer to the weekly requirements to ensure the planned menu does not exceed the dietary specifications.

Maintaining Child Nutrition (CN) Labels

When saving CN labels to document product crediting, the label should be taken directly from the package or a photo of the label may be saved. Watermarked CN labels may only be used to document meal pattern contribution when accompanied by a bill of lading to show proof of purchase. The items

with submitted watermarked CN labels were verified during the onsite review. Please replace all watermarked CN labels in your crediting documentation with the actual CN labels or photos.

Production records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. The production records submitted for the week of review were missing a few pieces of essential information for some menu items.

- The planned serving size, amount prepared, and amount leftover should be included for all items written in or added to the production record. Many of the additional fruits and vegetables added to the production records did not contain all of this information. These items were not credited toward their respective components for the week of review, but this did not result in meal pattern findings.
- If substitutions or accommodations are being made for students with special dietary needs, these should also be recorded on the production record.

Standardized Recipes

Recipes should reflect the products and practices that are used in each kitchen. Staff must either follow the recipe exactly as written or modifications should be made to the recipes to reflect the practices, products, and exact amounts actually being used. For example, on the day of lunch observation at West High School and Appleton Technical Academy, a recipe called for 14.75 ounces of diced chicken, but the staff member actually used 15 ounces. This was written in on the recipe to reflect this change. However, these changes should be communicated to the menu planner as any modifications may change the yield, crediting, or dietary specifications.

Maintaining Meal Documentation On-site

Current nutrition facts labels, ingredient lists, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Although this information is available electronically, consider making binders of this documentation for each site so staff may quickly reference this information.

Offering Juice at Each Meal

Juice is currently offered as part of the fruit component at each breakfast and lunch. No more than half (50 percent) of the fruit offered over the course of a week at breakfast or lunch can be in the form of juice. While most sites met the weekly juice limit for the week of review, consider adding more whole (fresh, canned, or frozen) fruit options to your menu. This will promote the consumption of whole fruit and help students to learn healthy eating habits for the future.

Elementary Menu

The elementary lunch menu contains verbiage about the milk varieties offered at breakfast. Please update your menu to reflect the milk varieties offered daily at lunch.

CACFP/Pre-K Meal Pattern for Early Childcare

The students not yet in kindergarten (5K) at Columbus Elementary School must be served breakfast that meets the CACFP/Pre-K meal pattern since they are served in the classroom. Under this meal pattern:

- All meal components should be served to students in at least the minimum serving size. Offer Versus Serve (OVS) is not an allowable service style for preschool or pre-K students.

- Cereal may contain no more than 6 grams of total sugars per dry ounce and yogurts may contain no more than 23 grams of total sugars per 6 ounces.
- Grain-based desserts are not creditable toward the grains component. Grain-based desserts include foods such as cookies, sweet rolls, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies.

For more information, please refer to the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Meal Pattern Finding #1:** There was a missing grain component at lunch on two days during the week of review at Columbus Elementary School and Appleton Bilingual School. A grain item was included on the planned menu, but was not included on the production record and was not offered.
 - On Monday, a whole grain roll was planned as the grain for the Turkey & Gravy entree, but production records show that rolls were only prepared to accompany the salads on this day.
 - On Wednesday, a pretzel rod was planned as the grain for the Chili Cheese Baked Potato entree, but this item was deleted on the production records and was not offered this day.

Appleton Area School District uses district-wide menus, so fiscal action must be assessed for all schools within the district offering these meals with a missing component.

These two days with the missing grain component contributed to a weekly grain shortage at lunch for the week of review at Columbus Elementary School and Appleton Bilingual School.

Repeat violations of a weekly grain shortage during subsequent Administrative Reviews may result in fiscal action.

Corrective Action Needed: Submit a statement specifically explaining how the menu planning will be communicated to staff to ensure the menu is offered as planned and all required components are offered. Additionally, include how production records will be completed to show that some menu items, such as whole grain rolls, are to be offered with more than one entrée on some days.

- ❑ **Meal Pattern Finding #2:** Columbus Elementary School exceeded the weekly juice limit on Wednesday during the week of review. Bananas were planned for service, but were not offered, based on the paper and electronic production records, causing the amount of juice offered over the week to be above 50% of the total fruit offered.

Corrective Action Needed: Since menu items were not offered as planned multiple times during the week of review, additional staff training is necessary. Submit your plan to provide all food service staff at Appleton Area School District with additional training on what must be offered at both breakfast and lunch, based on the meal patterns. Please include how staff should handle product shortages or substitutions in your training.

- ❑ **Meal Pattern Finding #3:** There was a daily meat/meat alternate shortage at lunch on Friday of the week of review at West High School and Appleton Technical Academy due to the quantity of diced chicken in the Asian Chicken Salad. The quantity of the diced chicken called for in the recipe credits as 1.75 oz eq meat/meat alternate. Additionally, although the Chicken Salad was not offered during the week of review, this recipe would have also caused a meat/meat alternate shortage had it been

offered. This daily shortage from the Asian Chicken Salad also resulted in a weekly meat/meat alternate shortage.

Repeat violations of a daily or weekly meat/meat alternate shortage during subsequent Administrative Reviews may result in fiscal action.

Corrective Action Needed: Submit revised recipes for the Asian Chicken Salad and Chicken Salad showing a sufficient quantity of diced chicken to credit as intended.

- ❑ **Meal Pattern Finding #4:** The crediting of the diced chicken called for in the Nacho Chicken Salad recipe differs based on the yield. The weight of the diced chicken called for to make 48 servings credits as 1 oz eq meat/meat alternate per serving. The weight of the diced chicken called for to make 9 servings credits as 0.75 oz eq meat/meat alternate per serving when rounded down to the nearest quarter ounce equivalent. This did not affect the daily or weekly meat/meat alternate quantities offered during the week of review at the elementary schools, but may lead to a meat/meat alternate shortage for high school students.

In speaking with the staff member who usually prepares the salads for West High School and Appleton Technical Academy, she stated that she follows the quantity directions to make one salad. These directions state to use a #24 scoop for the diced chicken. However, without a weight for this quantity of diced chicken, it cannot credit toward the meat/meat alternate component.

Corrective Action Needed: Weigh a #24 scoop of diced chicken and submit the weight in ounces to the Public Health Nutritionist. Once this has been submitted, the crediting of meat/meat alternate in this recipe can be determined and compliance with the daily and weekly meat/meat alternate requirements can be assessed.

- ❑ **Meal Pattern Finding #5:** The serving sizes for the baby carrots and red pepper strips during lunch on the day of review at Columbus Elementary School and Appleton Bilingual School were less than the planned ½ cup serving size and all bags did not have an equal number of vegetable pieces in them. This resulted in one non-reimbursable meal during lunch at Appleton Bilingual School, with the student selecting the red pepper strips as the only fruit or vegetable. This was also found at West High School and Appleton Technical Academy during lunch observation, but was corrected prior to lunch service.

The appropriate serving size for items, such as baby carrots or pepper strips, that do not fit neatly into spoodles or measuring utensils may be determined with a quick process. To do so, dice the product so that it fits into a measuring utensil without extra air. You may then count the number of pieces that went into that measuring utensil and that becomes the number or amount to serve to credit as the intended volume. This should be completed and documented using the [In-house Yield Study Procedures](#), which are available on the [Menu Planning](#) website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>). Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the School Food Authority's (SFAs) next regularly scheduled Administrative Review (AR).

Corrective Action: Submit a written statement explaining how the intended volume of vegetables will be offered going forward. Include how this will be communicated to staff and monitored going forward.

- ❑ **Meal Pattern Finding #6:** Only one milk variety was included in the milk bags delivered to classrooms for breakfast at Columbus Elementary School on the day of review. Corrective action was immediately requested and a member of the food service staff was able to deliver milk cartons in a second variety to classrooms during breakfast service. Production records submitted for the week of review show at least two milk varieties were offered each day at all meals. As explained by staff, the milk cooler at the site was not functioning, so cooler space was limited, which resulted in the error at breakfast.

Additionally, one classroom was delivered four total milk cartons during the same breakfast service prior to the second milk variety being delivered. All K-12 students must have access to at least two milk varieties for the duration of meal service.

Corrective Action Needed: Submit a written statement acknowledging your understanding that at least two milk varieties must be available for all K-12 students, and co-mingled pre-K students, at all meals and the action you will take to ensure this is corrected going forward.

- ❑ **Meal Pattern Finding #7:** The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the high school lunch menu. It may be listed daily or may be listed in one place on the menu with a statement that a variety of milk is offered daily as part of the reimbursable meal.

Corrective Action Needed: Submit a copy of the high school monthly menu showing milk is included in a reimbursable meal.

- ❑ **Meal Pattern Finding #8:** The National School Lunch Program and School Breakfast Program require that schools identify, near or at the beginning of serving lines, what constitutes a reimbursable meal at breakfast and lunch. Signage helps students understand what components make up a reimbursable meal.
 - Lunch signage was posted at all review sites, but lacked the statement “*students must take at least three full components, one of which is ½ cup fruit and/or vegetable, or a combination*”.
 - Appleton Bilingual School was missing breakfast signage that indicated the offered components and what they must select in order for their meal to count as reimbursable. The breakfast signage must list the three components and the four items offered, and must communicate to students that under Offer versus Serve (OVS), they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination. Note that signage is not required to be posted in each classroom when serving breakfast in the classroom, but consider adding signage to the containers used to deliver the food to benefit both students and teachers.
 - Lunch signage was posted at West High School and Appleton Technical Academy, but additional lunch signs should be posted near the beginning of *each* service area or line so it is visible to all students.

Corrective Action Needed: Submit a photo showing:

- Posted breakfast signage at Appleton Bilingual Academy
- Posted lunch signage at Appleton Bilingual School and Columbus Elementary School showing the specific statement in italics above.

- Posted lunch signage at the beginning of each service line at West High School/Appleton Technical Academy that also contains the specific statement in italics above.

Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Additionally, the statement informing students that additional servings will result in additional charges should be covered up or removed as it may mislead students into believing they may not select the full servings of fruits and vegetables with each meal. Alternatively, if this signage remains posted, add signage to the fruit and vegetable areas stating:

- High school students may select 1 cup of fruit and 1 cup of vegetables as part of a reimbursable lunch.
- K-8 students may select ½ cup of fruit and ¾ cup of vegetables as part of a reimbursable lunch.
- All students (K-12) may select a full 1 cup of fruit as part of a reimbursable breakfast.

Submit a statement explaining how will you make these fruit and vegetable servings sizes clear to all students.

- ❑ **Meal Pattern Finding #9:** Teachers and food service staff at Appleton Bilingual School and Columbus Elementary School were unclear about the Offer versus Serve (OVS) requirements for breakfast. When offering breakfast in the classroom, as Columbus Elementary does, teachers (including substitute teachers) must be trained on OVS in order to be able to identify a reimbursable meal. Teachers who assist with breakfast service at Appleton Bilingual School must also be trained on OVS in order to identify reimbursable meals.

Corrective Action Needed: Please submit a written plan for training all staff involved with the School Breakfast Program at Appleton Bilingual School and Columbus Elementary, along with completed training rosters or training certificates. Please also include a plan to monitor breakfast meal service and point of service activity going forward to prevent recurring errors at these sites.

Training resources from the DPI School Nutrition Team include:

- [Offer versus Serve webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html)
- Offer versus Serve - [Meal or No Meal PowerPoint presentation](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx) or [webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx; https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html)
- [Breakfast OVS handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf)

Staff showed an understanding of OVS at lunch at all meal observation locations; however, additional OVS training is always recommended for all staff throughout the school year.

- ❑ **Meal Pattern Finding #10:** Grain-based desserts are included on the breakfast menu for the Early Childcare students at Columbus Elementary School. For a complete list of foods considered grain-

based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>). As a reminder, a meat/meat alternate may be used to meet the entire grains requirement up to three times per week at breakfast for children not yet in kindergarten following the CACFP meal pattern.

Corrective Action: Submit the planned breakfast cycle menu showing it has been modified to meet the CACFP/Pre-K meal pattern requirements.

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

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

Allowable Costs

- 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. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found on our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- Finding #1:** On the Annual Financial Report, labor and food were allocated to programs via a percentage of sales, and labor must be allocated via time study and food must be allocated via invoice coding.

Corrective Action Needed: Please submit a statement that all expenses will be allocated by program going forward via use of a time study for labor and invoice coding for food cost,

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Processes for complaints

- All SFAs should have procedures 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. Please refer to the [USDA Program Discrimination Complain Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](#) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
 - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
 - Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
 - Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
 - Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
 - Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
 - **Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)**
 - Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).
- Please refer to the USDA [summary of the requirements](#) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team

Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Wellness Policy

❑ Finding #1: SFA LWP meets some but not all requirements as stipulated above

Food and Beverage Marketing – SFAs may only market products that adhere to Smart Snacks guidelines during the school day and include language related to this in the written policy.

Please include information regarding marketing only Smart Snacks compliant products.

458-Rule (cont.), Concessions – Your policy states “All AASD concessions for sale at school activities during school and non-school hours are expected to provide a minimum of one healthy option that follows the AASD Student Nutrition Standards...”

During the school day, providing a minimum of one healthy option would not be compliant. During the school day, all foods must meet Smart Snacks/AASD Student Nutrition Standards. During non-school hours, this is an excellent addition to your Wellness Policy.

Corrective Action Required: Please provide a timeline for updating the above items in your policy to become compliant with the final rule.

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

Thank you to the entire district for being diligent in ensuring foods sold during the school day to students meet the Smart Snacks standards. It is great that the entire district is using the [Alliance for a Healthier Generation's Smart Snacks Product Calculator](#) to assess product compliance with the Smart Snacks standards (<https://foodplanner.healthiergeneration.org/calculator/>). All fundraisers are being approved and tracked appropriately. The districts promotion of non-food treats and celebrations is also commendable and helps students to develop lifelong healthy habits.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

- One of the classrooms visited at Columbus Elementary did not allow the students to eat until 9:00. Since the product served was hot and not held in any form of insulated bag, this is a very poor food safety practice. Students should eat as soon as arrive in classroom or food should be delivered at a later to accommodate food safety and food quality.
- As a best practice, cafeteria tables should be cleaned between service times to avoid food safety concerns or possible consumption of TCS foods that have been left on the table for extended periods of time.

Food Safety

- The most recent food safety inspection must be posted in a publically visible location.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.

- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles 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 (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.

Time/Temperature Control for Safety (TCS) Food

- Milk and dairy products
- Shell eggs
- Meat (beef, pork, and lamb)
- Poultry
- Fish
- Shellfish and crustaceans
- Baked potatoes
- Heat-treated plant food, such as cooked rice, beans, and vegetables
- Tofu or other soy protein
- Sprouts and seed sprouts
- Sliced melons
- Cut tomatoes
- Cut leafy greens
- Untreated garlic-and-oil mixtures
- Synthetic ingredients, such as textured soy protein in meat alternatives

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°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 TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Most recent food safety inspection not posted in a publically visible location at ABS
Corrective Action Needed: Please post the most recent food safety inspection in a publically visible location outside of the kitchen. **Corrected on site. No further action required.**
- ❑ **Finding #2:** All Food Safety Plans do not contain site specific Standard Operating Procedures (SOPs), equipment lists, onsite staff, or all process 1, 2, 3 items.

Corrective Action Required: Please review your Food Safety Plan and make site specific updates to the plan and submit when complete. An updated prototype may be found on our website. <http://dpi.wi.gov/school-nutrition/food-safety#fsp>

- ❑ **Finding #3:** Because hot items are held outside of mechanical heating and cold items are held outside of mechanical refrigeration at Appleton Bilingual and Columbus Elementary, Time as a Public Health Control must be used.

Corrective Action Needed: Develop a Time as a Public Health Control SOP and place in all school's food safety plans who implement the process. Submit updated SOPs as attachment via email.

- ❑ **Finding #4:** Standard operating procedures (SOPs) for Breakfast in the Classroom, field trip meals, and Fresh Fruit and Vegetable Program are not included in the food safety plan at Columbus Elementary.

Corrective Action Needed: Add and adapt site-specific Breakfast in the Classroom and Fresh Fruit and Vegetable Program SOPs to the food safety plans at Columbus. Submit updated SOPs as attachments via email.

Buy American

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
 - If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
 - What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
 - Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
 - Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or

supply availability of market); this requirement applies to private labels as well as other labels.

- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). 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.
- More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

- ❑ **Finding:** The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List:
 - Trio Gravy - Canada
 - Frozen Green Peas - Canada
 - Frozen Corn - Canada
 - Bananas - Costa Rica

Corrective Action Needed: Complete and submit a non-compliant tracking form for the above products.

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snacks

Commendations/Comments/Technical Assistance/Compliance Reminders

- The person operating the POS did a very good job making sure all students took both components,

Findings and Corrective Action Needed

- ❑ **Finding #1:** The September and October claims were consolidated incorrectly and meals claimed did not match meals checked-off on the check-off sheets at the point of service. Fiscal Action will be calculated for those incorrectly claimed meals for September and October.
Corrective Action Required: Please submit all November 2018 check-off sheets for area eligible afterschool snack sites with the November claim.
- ❑ **Finding #2:** On October 17, 2018, only one component was served which resulted in the claiming of 71 non-reimbursable snacks.
Corrective Action Required: Please submit a statement that 2 components will be served at afterschool snack. Fiscal action will be assessed for the 71 non-reimbursable snacks.

Fresh Fruit and Vegetable Program

Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you to Appleton Area School District for participating in the Fresh Fruit and Vegetable Program (FFVP)! A special thanks to the FFVP Coordinator for providing documentation and answering questions for the claim validation. No errors were identified on the September claim during the off-site claim validation.
- The FFVP monthly menus are colorful and include pictures of each fruit and vegetable. What an excellent addition to the program!

Food Service Management Company

Commendations/Comments/Technical Assistance/Compliance Reminders

Responsibilities which the SFA may “not” delegate to the FSMC.

- Signature authority is the agreement between the SFA and the State agency to participate in the Child Nutrition Programs operated, as attested to in the permanent agreement when submitting the online contract. Thus, signature authority must remain with the authorized representative of the school in the submission of the online contract. This also means that the SFA School Food authority must submit the online contract and not FSMC employed food service director, so they may actual click the attestation button which serves as electronic signature.
- Before the monthly claims are submitted for payment, monthly edit check data must be reviewed by comparing daily meal counts to the number of eligible students to make sure accurate meals are claimed. Monthly edit checks must be reviewed by the authorized representative each month and signature-approved before claim submission, as this is the attestation to the claim’s accuracy.
- Every school year, each SFA with more than one school site must perform no less than one on-site review of the meal counting and claiming system in each school site operating the National School Lunch Program and 50% of schools operating the School Breakfast Program by February 1.

Other SFA responsibilities, which may, in part, be delegated to the FSMC, but still require oversight:

- Maintain responsibility for the implementation of free and reduced-price policy in accordance with 7 CFR 245. SFA responsibilities include conducting hearings and verifications related to applications for free and reduced-price meals.
- An employee of the FSMC may perform for the SFA various aspects of the application and certification process of eligibility for school meals programs, if a provision for this service is included in the scope of the original solicitation.
- Retain title to all USDA Foods and ensure that all USDA Foods received by the SFA, and made available to the FSMC (including processed USDA Foods in processed end products), accrue only to the benefit of the SFA's nonprofit school food service and are fully utilized therein. This provision also applies to any refunds, rebates, discounts, and credits received from processors. The SFA must ensure that the FSMC has credited it for the value of all USDA Foods received for use in the meal service in the school year, in accordance with 7 CFR 250.51(a-d).
- Ensure the FSMC maintains applicable health certification(s) and assures that all State and local regulations are being met by the FSMC in preparing or serving meals at a SFA facility.
- Establish and maintain an advisory board composed of parents, teachers, and students to assist in menu planning.
- Develop the 21-day cycle menu for the FSMC request for proposal, unless the SFA is unable to develop a cycle menu, the FSMC may develop the 21-day cycle menu as long as doing so was a requirement of the original solicitation.
- Retain control of the quality, extent, and general nature of the food service and the prices to be charged to the children for meals. This includes retaining control of the nonprofit school food service account and overall financial responsibility for the programs operated; establishing all

prices for all meals served under the nonprofit school food service account (example, pricing for reimbursable meals or non-program foods, such as a la carte foods, and adult meals.)

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

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

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