

USDA Child Nutrition Programs
Commendations, Corrective Actions & Technical Assistance

School Food Authority: Ellsworth Community School District

Agency Code: 471659

School(s) Reviewed: 20-Ellsworth Middle School

Review Date(s): March 13-15, 2019

Review Team: TCB Reviewer

Date of Exit Conference: 3/15/2019

Corrective Actions Due Date: 4/22/2019

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.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Ellsworth Community School District 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 TCB review team appreciates the eagerness of the staff at Ellsworth Community School District for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, local wellness, and overall responsiveness to recommendations made while on site. We were impressed at the overall cleanliness of the kitchen and the courteousness of staff toward students.

The TCB review team is confident that Ellsworth Community School District will continue to improve their knowledge and operation of child nutrition programs.

Commendations

Commendation #1: *Thank you for your hospitality and flexibility, particularly with the weather. I appreciate you accommodating the ever-changing review dates due to weather-related issues.*

Commendation #2: *Thank you for incorporating any suggestions immediately.*

Required Corrective Actions

Please review and reply to this Corrective Action Plan to identify procedures and/or documents needed to correct these issues.

Finding #1: An examination of the production records from the week of review in the month of review revealed the SFA did not ensure the use of production records in accordance with 7 CFR 210.10 and 220.8. Production records did not provide sufficient evidence to show that daily meal pattern requirements for fruit at breakfast were met for all meals claimed, as follows: sufficient fruit was not documented for 3 meals at breakfast on Tuesday, 2 meals at breakfast on Thursday, and 3 meals for breakfast on Friday. Additionally, a similar error occurred with the daily meal pattern requirements for fruit/vegetable at lunch not being met for all meals claimed as follows: sufficient fruit/veg was not documented for 18 meals at lunch on Monday. This is a repeat finding.

Required Corrective Action #1: Provide 2 weeks of completed breakfast and lunch production records from the month of March and/or April (response may span both months), demonstrating sufficient fruit at breakfast and sufficient fruit/vegetable at lunch for all meals served at the Middle School.

Finding #2: The SFA did not ensure that every reimbursable meal service line met the daily and weekly meal pattern requirements for the appropriate age/grade group served in accordance with 7 CFR 210.10 and 220.8. During the week of review in the month of review, an examination of the production records revealed just $\frac{1}{4}$ cup of bean/pea/legume was offered rather than the required $\frac{1}{2}$ cup minimum serving for the week. This is a repeat finding.

Required Corrective Action #2: Provide 1 week of planned lunch production records from the month of March or April, demonstrating sufficient vegetable subgroups for all vegetable subgroup categories at the Middle School.

Finding #3: SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.

Required Corrective Action #3: A) Complete the DPI Nonprogram Foods Revenue Tool and upload into the shared Google folder using a 5 day reference period from the current school year; and B) Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed. This is a repeat finding.

Finding #4: The SFA did not meet the requirements of the Buy American Provision in accordance with 7 CFR 210.21(d). The SFA did not follow procedure to monitor the vendor's performance of the Buy American Provision as written in their current contracts. There was no process in place, and no exemption paperwork for items such as: Pineapple, Mandarin Oranges, Bananas, and Cucumbers (Mexico).

Required Corrective Action #4: The SFA must develop (or implement the provided procedures shared during onsite) and submit a statement that vendor performance will be monitored. The procedure must include: 1) how the SFA will monitor the country of origin on product labels when receiving deliveries in order to identify and address non-domestic products, and 2) how the SFA will periodically monitor and document storage facilities, refrigerators, freezers, dry storage and warehouses to ensure they are receiving domestic products or products that meet the procurement contact exceptions. Submit procedure and example/completed paperwork to the shared Google folder.

Recommended Technical Assistance

Please review the following Technical Assistance; a response is not required. Internally, identify procedures and/or documents needed to work toward continuous improvement of the program. Please note, numbers below may not correspond directly to numbered findings above.

Technical Assistance #1: *The DPI website provides a number of [Production Record and Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) resources available online. (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>)*

Technical Assistance #2: *The DPI website provides financial management resources concerning [Nonprogram Revenue](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial). Scroll down about half-way to the Non-Program Food Revenue section. (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>)*

Technical Assistance #3: *The DPI website provides guidance regarding [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american), including a template policy, the justification form called "Buy American – Noncompliant Product List" and other resources. (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>)*

The State Superintendent of Wisconsin Department of Public Instruction shares a vision that every student will graduate prepared for college and career. Her 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).



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