

**USDA Child Nutrition Programs**  
*Commendations, Corrective Actions & Technical Assistance*

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**School Food Authority:** Clear Lake School District

**Agency Code:** 481127

**School(s) Reviewed:** 60-Clear Lake Jr

**Review Date(s):** January 25, 2019

**Review Team:** TCB Reviewer

**Date of Exit Conference:** 1/25/2019

**Corrective Actions Due Date:** 4/17/2019

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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 Clear Lake 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 Clear Lake 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 Clear Lake School District will continue to improve their knowledge and operation of child nutrition programs.

## 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:** *SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. The number of lunch counts have exceeded the number of attendance adjusted eligible students on (2) days during the review period (12/13, and 12/21); 3 total meals not justified by attendance.*

**Required Corrective Action #1:** *Provide an explanation for the days that more meals were claimed than students shown in attendance.*

**Finding #2:** *Based on the SY 2017-18 Annual Financial Report, the nonprofit school food service account appears to have a net cash resource in excess of 3 months average expenditures. The SFA does not have an approved spend down plan from the State Agency (7 CFR 210.9(a)).*

**Required Corrective Action #2:** *Submit a plan and timeline for reducing the net cash resources to below 3 months operating expenditures. Please note, a formal notification and report may also be required outside of the AR process.*

**Finding #3:** *The SFA does not have procedures for handling discrimination complaints specific for the school meal program.*

**Required Corrective Action #3:** *Provide a timeline for when a school meal program complaint policy will be put in place or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.*

**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 the procedure in place to monitor the vendor's performance of the Buy American Provision as written in their current contracts. There was no documentation for sliced frozen strawberries from Dole.*

**Required Corrective Action #4:** *During the review, staff provided the appropriate documentation for the specific exemption. The SFA will provide a plan to ensure Buy American is monitored regularly, to properly account for any non-domestic items as they occur and prevent errors like this in the future.*

## 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:** A number of [Claiming](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming)-related resources are available from the DPI website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming>).

**Technical Assistance #2:** A number of [Financial Management](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) resources are available from the DPI website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

**Technical Assistance #3:** All SFAs must have procedures in place for handling civil rights complaints regarding discrimination in the National School Lunch Program and School Breakfast 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 or State Agency within 3 days. Additional information can be found on the DPI website for [Civil Rights](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

**Technical Assistance #4:** 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. 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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



*With School Nutrition Programs!*