

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

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**School Food Authority:** Luck Joint School District

**Agency Code:** 483213

**School(s) Reviewed:** Luck High School

**Review Date(s):** 2/25/19-2/26/19

**Date of Exit Conference:** 2/26/19

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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 for \$10. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, 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).
- The US Department of Agriculture 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

## **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Luck Joint 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**

Free and Reduced Price Meal Applications

- There was a sample size of 173 students selected for the review. All households were receiving the correct benefits. Excellent job!

Public Release

- SFA sent out the Public Release to multiple places for the 2018-2019 SY. Great job.

Direct Certification

- SFA was running Direct Certification matches in the required time frames.

#### **Verification**

SFA did a great job of completing the verification process by November 15. The Verification Collection Report was also completed for the 2018-2019 SY.

#### **Meal Counting and Claiming**

Counts and claims were verified on site. The edit checks matched the final claims.

### **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

#### **Commendations**

Thank you to the staff at Luck School District for their warm welcome and cooperation throughout the administrative review. Thank you, also, for all your questions, willingness to learn and quickly implement recommendations and required changes. It has been a pleasure working with your staff.

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

##### **Production Records**

Production records are required as documentation that your school is serving reimbursable meals that contain all required meal pattern components; they prove that reimbursable meals were served.

Production records provided were not easily understood.

Continue to work with all staff members to document planned usage, actual usage, proper serving utensils used and leftovers. Thorough, accurate production records also aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Technical assistance provided on documenting portion sizes for all food items and including that information in the correct column. This includes the salad bar production records and transport sheets.

Consider, also, simplifying to two meal patterns, K-8 and 9-12, rather than serving K-5, 6-8 and 9-12 meal patterns. Managing two meal patterns, versus three, makes menu planning easier for school nutrition professionals.

### **Recipes**

Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes.

Recipes should be standardized to your kitchen to reflect the products and practices that are used in your kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

For more recipe ideas, refer to [USDA's What's Cooking? Recipes](https://whatscooking.fns.usda.gov/) that include nutritional and crediting information. They are a great resource to use in USDA School Meals Programs for cooking healthy and tasty recipes. Note: even though USDA refers to these as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they have been tried, tested, and adapted to your food service operation. (<https://whatscooking.fns.usda.gov/>).

We also encourage viewing the webcast, [What's the Yield with Standardized Recipes?](https://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (<https://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

The following recipes need to be updated for clarity:

- Nacho Supreme - review the procedure section and ensure information is correct. Onsite, it was mentioned that the scoop sizes listed in the instructions are not the actual serving utensils used.
- Chef salad - the instructions say to add 2.5 cup of lettuce, however the measure amount of lettuce in the ingredients list states 3 cups.

### **Signage**

Because the vegetables on the garden bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. [Salad Bar Signage Template](#) can be found on our [Signage](#) webpage, under the heading Additional Signage Resources (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

### **Menu**

The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal.

### 3. RESOURCE MANAGEMENT

#### **Nonprofit School Food Service Account**

SFA would cater events and only charge the group the raw food cost. Since the food service director is creating the order, receives the delivery, etc., the food should be marked up to cover all costs of the purchase and then the organization should be sent an invoice. The paid invoice should go back into the food service account. The food service account cannot be a “pass through” account.

Another option would be to have the school groups set up an account with the distributor and then they could order directly from them. This would eliminate the food service director having to order and funds would not have to be charged to the food service account.

#### **Unpaid Meal Charge Policy**

- SFA had an unpaid meal charge policy on file and was actively using it.
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](#) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

#### **Paid Lunch Equity**

SFA submitted and completed the PLE tool for the 2018-2019 SY. There was a positive fund balance but the SFA chose to increase their prices by \$.05 for the 2018-2019 SY.

#### **Revenue from Nonprogram Foods**

Based on the Resource Management Questionnaire, the SFA triggered for a comprehensive review of Revenue from Nonprogram foods.

- Nonprogram 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 costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.

The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

#### **Indirect Costs**

SFA was not charging any indirect costs to the food service account.

#### **4. GENERAL PROGRAM COMPLIANCE**

##### **Civil Rights**

SFA was following USDA civil rights regulations.

##### **On-site Monitoring**

N/A-SFA has one kitchen and service line for both schools in the district.

##### **Local Wellness Policy**

SFA had a wonderful and thorough local wellness policy on file.

##### **Smart Snacks**

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

##### **School Store**

There is a school store selling snacks and beverages. Middle school and high school have access to this store.

- Apple juice 15.2 fl oz - size limit exceeded
- Orange juice 15.2 fl oz -size limit exceeded

##### **Fundraisers**

Fundraisers are currently being documented on an exempt fundraiser tracking tool. Thank you.

##### **Vending Machine**

If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie ( $\leq 5$  kcal/fluid oz.) flat or carbonated, or no-calorie beverages ( $< 5$  kcal/8 fluid oz;  $\leq 10$  kcal/20 fluid oz.) flat or carbonated beverages are unallowable.

At Luck School 7-12 grades have access to the vending machine. The no-calorie beverages are not allowable for middle school students.

##### **Coffee shop**

All beverages currently sold in the coffee shop are allowable.

Coffee and espresso drinks are allowable beverages at the high school (grades 9-12) level. Ensure products are offered in acceptable portion sizes to be compliant with the Smart Snacks standards. Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar needs to be added together when determining if the beverage meets the guidelines below.

Beverage Guidelines:

- Calorie-free beverages (for black coffee only)

- <5 calories per 8 fl. oz.; ≤10 calories per 20 fl. oz.
  - Maximum serving size: 20 fl. oz.
- 
- Lower-calorie beverages (for coffee with cream and/or sugar)
    - ≤40 calories per 8 fl. oz.; ≤60 calories per 12 fl. oz.
    - Maximum serving size: 12 fl. oz.

To help determine if coffee drinks are compliant, utilize the [Alliance for a Healthier Generation Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) (https://foodplanner.healthiergeneration.org/calculator/). If they are, you will be able to print a reference sheet showing compliance directly from the website as record keeping documentation.

### **Professional Standards**

Professional standards requirements were being met. SFA was using the DPI Professional Standards Tracker.

### **Water**

Water was available for breakfast and lunch.

### **Food Safety**

SFA was actively using the food safety plan and had the appropriate SOPs on file, including field trips and milk barrels. Food safety inspections & Employee Reporting Agreements were on file.

### **Buy American**

The food service director does maintain documentation for non-domestic products, however, it was noted that the *reason for exception* was not always accurate. Some of the fruits and vegetables are likely available domestically during the summer months, however, many of them were marked as simply not available on the Buy American non-compliant product list. Contact your vendor to find out when these products will be available domestically and update the non-compliant product sheets.

### **Reporting and Recordkeeping**

Records kept on file for 3 years plus the current.

### **Summer Food Service Program (SFSP) and School Breakfast Program (SBP) Outreach**

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 (insert SFA) USDA requires 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](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- 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](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator  
 Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

## 5. OTHER FEDERAL PROGRAMS REVIEWS-NOT APPLICABLE TO SFA

### Corrective Action Needed

#### 1. MEAL ACCESS AND REIMBURSEMENT

##### Findings and Corrective Action Needed: Counting and Claiming

**Counting and Claiming Finding #1:** Sharing of information form did not have the programs broken out for households to select which programs they would like fees waived.

**Corrective Action Needed #1:** List all of the programs that households can have their fees waived for. Submit a copy to the Nutrition Program Consultant. **Completed on site. No further action required.**

#### 2. MEAL PATTERN AND NUTRITIONAL QUALITY

##### Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality (MP)

**MP Finding #1:** Finding: Production records not easily understood. Planned portion sizes frequently missing, or information documented under the incorrect column heading. Weight of food items frequently mistaken for the crediting in ounce equivalents (oz eq). All accompanying food items (eg, bun for chicken nuggets) not always clearly identified on production records.

**Corrective Action Needed:** Submit 1 week of completed production records and salad bar production records for both breakfast and lunch. Ensure that numbers are placed in their correct columns, every menu item has a planned serving size, and that all food items served with a reimbursable meal are documented.

**MP Finding #2:** Standardized recipes were not updated to how kitchen prepares recipes.

**Corrective Action Needed:** Please update the recipes in use to be standardized to your operation:

- Nacho Supreme - review the procedure section and ensure information is correct. Onsite, it was mentioned that the scoop sizes listed in the instructions are not the actual serving utensils used.
- Chef salad- the instruction say to add 2.5 cup of lettuce, however the measure amount of lettuce in the ingredients list states 3 cups.

**MP Finding #3:** Milk not listed on the printed menu.

**Corrective Action Needed:** Add milk to your monthly menu and submit a copy for corrective action. *Completed onsite, thank you! No further corrective action needed.*

*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 (RM)

#### ***Findings and Corrective Action Needed: Annual Financial Report***

**RM Finding #1:** On the Annual Financial Report the non-program foods did not have any labor broken out for it.

**Corrective Action #1:** Submit a statement of understanding that on the 2018-2019 Annual Financial Report, labor costs will be distributed to non-program foods.

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

**RM Finding #2:** The Nonprograms Food Revenue Tool for the 2018-2019 SY has not been completed.

**Corrective Action Needed #2:** Submit a copy of the Nonprogram Foods Revenue Tool to the Nutrition Program Consultant.

### 4. GENERAL PROGRAM COMPLIANCE (GP)

#### **Findings and Corrective Action Needed for the Smart Snacks:**

**GP Finding #1:** Size limit exceeded for juice sold in the school store. All 100% juice must be 12 fl. oz. or less.

**Corrective Action Needed:** State what will be done with these products to comply with the Smart Snack regulations.

**GP Finding #2:** No-calorie beverages available to middle school students in the vending machine. No-calorie beverages are not allowable at the middle school level. Only plain water, 100% juice, or milk are allowable smart snack beverages for students in grades 6-8.

**Corrective Action Needed:** State what will be done with these products to comply with the Smart Snack regulations.

### 5. OTHER FEDERAL PROGRAMS REVIEWS (OTHER)

#### **Findings and Corrective Action Needed for the Summer Food Service Program:**

**Other Finding #1:** SFA was not promoting the Summer Food Service Program

**Other Corrective Action #1:** Submit a statement on how the SFA will promote the Summer Food Service Program.

Carolyn Stanford Taylor, State Superintendent of Wisconsin Department of Public Instruction, shares 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 your students' success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

