

**Administrative Review Summary Report
Technical Assistance and Corrective Action Plan**

Agency Code: 51-4620

School Food Authority: Racine Unified School District

School(s) Reviewed: Jerstad Middle, Janes Elementary, Horlick High, McKinley Middle Schools

Review Date(s): December 12-16, 2016

Date of Exit Conference: December 16, 2016

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 School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations that may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrate corrective action was completed are specified.

Appreciation, Commendations, and Noteworthy Initiatives:

Thank you for all the courtesies extended to us during the on-site review. It was helpful to have all of the requested documentation pulled and ready for the review. We appreciated the all work done prior to the review especially in completing the Off-site Assessment Tool. I hope you found the time spent in providing technical assistance during this on-site review helpful.

The entire food service team is providing excellent customer service and the meals were colorful and appetizing. Strong efforts are being made to plan and implement meals which meet USDA meal pattern requirements and food service staff have been very open to suggestions on ways to bring meals into compliance. The cafeteria is a classroom where students learn eating behaviors which can last a lifetime and we thank everyone involved for their commitment to child nutrition efforts.

The School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. 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 can be found on our training page, along with other upcoming trainings and webinars at: <http://dpi.wi.gov/school-nutrition/training>.

Consider pursuing a GOALS (Goal Oriented Achievement Learning Skills) Certification. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration, operations, communications, and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>.

School Food Authorities (SFA) are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources and best practices may be found on the SNT website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". His goals are for students to have the knowledge, skills, and habits which 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 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 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 <http://dpi.wi.gov/statesupt/agenda-2017>.

Review Areas

1. Meal Access and Reimbursement: Certification and Benefit Issuance, Verification, Meal Counting and Claiming

Comments, Technical Assistance, and Compliance Reminders:

Certification and Benefit Issuance

- Five hundred and ninety eligibility determinations were reviewed, two application with errors were identified. In both cases one source of income was missed when calculating family size and income for meal benefits.

Applications

- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, you should not convert it to annual, but using the Income Eligibility Guidelines (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility-guidelines-1617.doc>), you would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).

Zero Income

- Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

Household Size Box

- As a reminder, if the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the School Food Authority (SFA) is required to follow up with the household to clarify the correct number of people in the household and ensure all household members have been included on the application before an eligibility determination is made.
- If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Midwest Regional Office, any application that does not have this box completed is considered an incomplete application.

Incomplete Applications

- Any application which is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including email. The determining official should document the details of the conversation, date, and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian.
- The USDA FNS website offers the application materials in 49 languages at: <http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.

- The nonprofit food service account may be used to pay for translation services for food service purposes if there is a need to translate materials in a language not currently available.

Annual Income

- If the household provided only annual income, the SFA must follow up with the household to ensure the amount is an accurate reflection of the household's current income.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications indicating a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Transferring Students

- When a child transfers to a new school within the same SFA, the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same SFA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between SFAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages SFAs to immediately accept the eligibility determinations made at a student's previous SFA when a student transfers between SFAs during the school year, over the summer, or at the start of the next school year. The transfer of eligibility between SFAs for students attending CEP schools will be required by July 1, 2019.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is processed. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must contact DPI prior to implementing this flexibility for approval

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year, at or near the beginning of the school year, three months after the initial run (November), and six months after the initial run (February).
- The effective eligibility date for a DC eligible student is the date of the original output file.

Disclosure

- The information provided by families on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits. The SFA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers. Consent must be obtained each school year. A template sharing information form is located on the SNT webpage here at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc>.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, it is strongly recommended the *Disclosure Agreement* form should be signed and on file at the district. A template disclosure form is located on the SNT website here at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.

Verification

- Remember when applications are chosen for verification, the person designated as the Confirming Official should be reviewing these applications prior to contacting the family to ensure the initial determination is correct. The Confirming Official should sign and date the back of the application.

- The LEA has a regulatory obligation to verify “for cause” all approved applications which may be questionable. For more information, refer to the current Eligibility Manual.

Meal Counting and Claiming

- A review of the meal counting and the claim for November was conducted and found no errors.
- Please note SFAs may claim visiting students in the paid category or the individual’s category with documentation, unless they are from a CEP school.

Community Eligibility Provision

- You will want to make sure you maintain all certification documents supporting your participation in Community Eligibility Provision (CEP). REMINDER: the current Identified Student Percentage (ISP) and claiming percentages are approved for a four year cycle. CEP participating schools will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).
- USDA guidance has been expanded in memo SP 54-2016 (<http://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1>) to allow for the use of one form for both meal eligibility and as an alternative household form to be used in CEP schools. This may alleviate confusion among households and administrative staff at a mixed district. This memo clearly outlines the requirement to cost-allocate expenses back to the district for processing and distributing forms in CEP schools. CEP applications and labor hours involved with processing them cannot be paid for from the nonprofit school food service account.
- There must also be a method to accurately distinguish between forms from students in CEP vs. non-CEP households. CEP applications are not subject to verification, independent review of applications, and the certification and benefit issuance portion of the AR review; nor do these students carry individual meal eligibilities which can extend benefit to other students.

2. Meal Pattern and Nutritional Quality: Meal Components and Quantities, Offer versus Serve, Dietary Specifications and Nutrient Analysis

Appreciation, Commendations, and Noteworthy Initiatives:

Thank you to all food service staff for their positive attitudes, willingness to assist with the review process, and for their dedication to providing excellent customer service to students. Your efforts make a difference!

Comments, Technical Assistance, and Compliance Reminders:

Meal Pattern and Nutritional Quality

- It is highly recommended to view the training webcasts located at: <http://dpi.wi.gov/school-nutrition/training/webcasts>. There are short webcasts available that provide more information on each meal pattern component and on additional topics such as production records, product formulation statements, and offer versus serve. Make sure to join us on the second Tuesday of every month at 2:00 p.m. for the *What’s New with School Nutrition* webinar. More information can be found at <http://dpi.wi.gov/school-nutrition/training/whats-new>.
- Staff at the middle and high schools would benefit from additional training on offer versus serve. It was observed at Jerstad-Agerhlo Middle School that staff instructed some students to take a milk even when students already had a reimbursable breakfast. It was also observed at Horlick High School that there was some confusion about how much fruit students could take with their lunch. Both of these situations were discussed onsite.
- As a reminder, all students must be offered a milk variety at breakfast and lunch. It was observed at Jerstad-Agerhlo Middle School that fat free chocolate and fat free white milk was offered to students. However, the white milk option on the service line ran out early in service and staff was prompted to replenish that option for students. It was also observed that one student at McKinley Middle School did not have access to a milk variety at lunch because the white milk option had run out and was not replaced in time. It is recommended to put out more white milk at the beginning of service since students are taking it. Having more available will help reduce the chance a milk variety will run out during service and students may go through the line before the variety is replenished.
- Just as a reminder, there is no overlap in calorie requirements at lunch for students in grades K-8 and those in grades 9-12. This means grades K-8 cannot receive the same meal pattern for lunch as grades 9-12. It is recommended to separate the grade groups out at schools where they are not

already separated in order to simplify meal service and ensure compliance with meal pattern regulations. Options to consider include having separate lunch periods for the different grade groups or sending one grade group through the lunch line before the other grade group.

General Program Compliance

- Make sure to review any foods or beverages sold to students during the school day for compliance with Smart Snacks regulations. It is best to run products through a calculator tool like the one available from the Alliance for a Healthier Generation at: https://www.healthiergeneration.org/take_action/schools/snacks_and_beverages/smart_snacks/alliance_product_calculator/ rather than depend on manufacturers to provide accurate information on compliance. Remember products may be compliant for one grade group but not another. It is recommended to print out the calculator results and keep them on file. Refer to the Smart Snacks “In a Nutshell” handout at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf> for more information. Additional information can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- Consider using the optional Smart Snacks recipe analysis tool located at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/smart-snacks-recipe-analyzer.xlsx> to help determine the compliance of recipes which are made in-house and then sold to students. As discussed onsite, the Coco Puffs treats recipe was run through this tool but a question about the recipe was forwarded on to USDA for clarification. Guidance will be emailed after the review as soon as possible.
- It was observed onsite students may currently purchase a second meal. Bundled meals cannot be sold as a unit at a single price because they will exceed the maximum calorie limit of 350 calories for entrées and therefore will not be in compliance with the Smart Snacks guidelines. Each individual item in the bundled meal would have to be evaluated for compliance with Smart Snacks standards depending on whether it is an entrée, snack/side, or beverage. Items should be priced individually and sold ala carte. This was discussed and the district will be looking into changing over to a la carte pricing for next semester.
- To help determine what can be considered an entrée under Smart Snacks, refer to page 8 in this resource: http://www.fns.usda.gov/sites/default/files/tn/USDA_SmartSnacks.pdf. Guidance can also be found beginning on page 6 under the heading of “Entrees” at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP23-2014v3s.pdf>.

3. Resource Management: Risk Assessment and Comprehensive Review of Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Non-program Foods, Indirect Costs

Comments, Technical Assistance, and Compliance Reminders:

Annual Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. This will aid the district in calculating its “yearly” reference period for non-program food compliance which is highly recommended. The new 16-17 Annual Financial Report (AFR) instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.

Allowable costs

- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance is located here on our web site: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.
- 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. SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.

Paid Lunch Equity

- The Paid Lunch Equity tool must be completed yearly and prices raised accordingly with a maximum yearly increase of \$0.10 as required by regulation.

- Thank you to the Food Service Secretary for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

Revenue from Non-program Foods

- Regulations now require schools to run what is called the Non-Program Foods Revenue Tool which will determine if the school is generating sufficient revenue to cover food costs. Information used to run the tool is taken from the Annual Financial Report (AFR). This department strongly recommends schools cover all food and labor costs for all ala Carte activities. The USDA tool is located on our website at http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls.
- Also as a reminder non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals, Catered Meals, and Food Service operated Vending Machines. All non-program food costs including food, labor, equipment, purchased services, and other expenses must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit. There is a calculator located on our website to aid you in calculating the prices of your non-program foods. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/nonprogram-food-price-calculator.xlsx>
- To document non-program food compliance with the Federal Regulation, the USDA Non-program Foods Revenue Tool needs to be completed. To do this, the SFA must select a reference period of at least 5 consecutive operating days of a regular school week, and compare the reference period revenue ratio to the food cost ratio to determine if the revenue ratio is equal to or greater than the food cost ratio. Rather than separating all costs for the entire year (although recommended), SFAs must separate their non-program food costs from their program food costs for the selected period to complete the Non-program Foods Revenue Tool. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance.

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

SFAs must collect the following SFA-wide information for the reference period

- For non-program food revenue, the dollar amount of non-program food sales, including ala carte sales, adult meals, vending machines, and any other non-program food purchased with nonprofit school food service account funds. For total revenue add the dollar amount of program and non-program food sales.
- For non-program food cost data, include:
 - An itemization of all non-program foods to be offered during the reference period;
 - The per item/serving cost of each non-program food, including food sold only as non-program food, food sold as program and non-program food (crossover food);
 - The number of servings/items sold.
- For total food cost data, include all non-program food cost data and program food cost data. Program food cost data should be readily available using production records, invoices, etc.

Indirect Costs

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.

- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

4. **General Program Compliance: Civil Rights, On-site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in Schools, Professional Standards, Water, Food Safety, Food Storage, Buy American, SBP Outreach, Reporting, and Recordkeeping**

Comments, Technical Assistance, and Compliance Reminders:

Civil Rights, Nondiscrimination Statement

- When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was just updated in October 2015 <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, "**This institution is an equal opportunity provider,**" so that it can be printed in the same size font as the other printing in the document.

And Justice for All Poster

- We appreciated that the lunch room area had the food safety inspection and the new "And Justice for All" posters posted on the cafeteria wall so the public can read the information.

Civil Rights Training

- The annual Civil Rights training had been attended by all food service staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually and documentation was available for review.

Special Dietary Needs

- All food substitutions for children with disabilities must be documented by a licensed medical professional. We have a prototype Medical Form posted on our website that is also available in Spanish and Hmong which you can use at: http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special_dietary_requests_form.pdf. When the form is completed indicating the special dietary request is based on a disability, the school is required to provide a meal that meets the child's needs as documented. The meal would not have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child. Additional information on Special Dietary Needs can be found on the DPI School Nutrition Team website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- School food service staff may make food substitutions, at their discretion, for individual children who do not have a disability. The school must still have a completed Dietary Request Form on file from a medical authority (could be a school nurse) certifying the student as having a special medical or dietary need. Such determinations are only made on a case-by-case basis and all accommodations must be made according to the USDA's meal pattern requirements in order to claim.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price meal benefits. It was noted meal prices for student meals (i.e., \$2.80, .40, 0.00) along with a code of A, B, or C are visible on the computer screen which can be seen by students. Although this is considered overt identification this reviewer felt with the computer screen turned perpendicular to students and the length of time it was displayed was so quick students would have to be very astute to decipher the coding.

Processes for complaints

- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination complaint 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. The form to assist in filing these complaints can be found on the DPI SNT website at:

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 the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure this is included in the district procedures to ensure compliance.

On-site Monitoring

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h). This is documented for each school operating the NSLP by February 1.
- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo SP 56-2016 <http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> under the SFA onsite monitoring section.
- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility> under the resources for currently participating sites section.

Local Wellness Policy and School Meal Environment

- Under the Healthy Hunger-free Kids Act of 2010, all School Food Authorities are required to have a written Local Wellness Policy (LWP) and have an active Wellness Committee. Information on school wellness policies may be found on our website at <http://dpi.wi.gov/school-nutrition/wellness-policy>.
- LWPs should include language related to nutrition education, nutrition promotion, and nutrition guidelines available for all foods on campus, physical education, and physical activity.
- SFA must inform the public about the content of the LWP and retain documentation regarding the notification.
- SFA must review and update the LWP on a periodic basis (recommended annually) and retain documentation demonstrating how this requirement is met.
- SFAs must permit parents, students, physical education teachers, school health professionals, school administrators, school board representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. The SFA wellness committees should include a diverse team of committed school and community stakeholders. SFAs are required to actively seek members for the wellness committee which represents each of the above categories and retain documentation all have been notified of participation availability.
- The SFA must conduct an assessment of the implementation of LWP every 3 years. SFAs are required to retain a copy of the assessment on file. The assessment should include the extent to which SFAs are in compliance with their LWP, the progress made toward attaining the goals of the LWP, and the extent to which the SFA's LWP compares to a model policy. *Implementation-Monitoring Plan* template has been developed to assist SFAs to assess their LWP progress. This is found on page 43 of the *Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit* (http://fns.dpi.wi.gov/fns_wellnessplcy2).
- SFA are required to inform and update the public (including parents, students, and others in the community) about the assessment of the implementation of LWP.

Smart Snacks in Schools

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last instructional period, must be in compliance with the new "Smart Snacks" regulation which became effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- Smart Snacks "in a nut shell" a shot one page description of these regulations is located here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>

- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- The hiring standards for SFA directors are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements. A chart containing the requirements is located here on our web site: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>. and is also provided here for your reference:

Directors	Managers	Other Staff	Part Time Staff
	(20 hrs. or more/week)	(less than 20 hrs./week)	
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

- Annual training must be job-specific and intended to help employees perform their duties. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. Training obtained since April 1, 2015 may count towards training requirements. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.
- Racine Unified School District clearly documented all required training information and maintain a file with the name of staff person and the training completed.

Water

- Water was available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Food Safety Inspections

- Every school operating USDA School Child Nutrition programs, must have two food safety inspections during each school year, one in the fall of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site's Food Safety Plan.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious food service staff are very knowledgeable about foodservice practices and use safe food handling practices. All temperature, calibration, and sanitizing solution logs were up to date.
- All schools must have a comprehensive site-specific food safety plan on site which includes all process 1, 2, and 3 items, all standard operating procedures (SOP) for each individual site, all equipment, and food service staff and must be reviewed yearly. Updated prototype food safety plan templates and SOPs may be found at our website under <http://dpi.wi.gov/school-nutrition/food->

[safety#fsp](#). Thank you for maintaining a Food Safety plan with equipment, food processes 1-2-3 and Standard Operating Procedures (SOP).

- Remember all food service employees must have a signed Employee Reporting Agreement on file.

Storage

- SFAs are required to ensure facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. They were all in good order.

Time as Public Health Control

- When using “Time as a Public Health (Temperature) Control”:
 - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
 - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
 - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees 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 Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all left over TCS foods must be discarded.

Must be kept above 135 on hot line with mechanical heat	Must be kept under 41 degrees with mechanical refrigeration
Animal protein – eggs, meat, chicken, fish, shellfish, etc.	Milk and cheese, including house made dressing made with milk
Tofu and soy products –texturized vegetable protein, hot edamame	Hard boiled eggs
Baked potatoes	Tofu, edamame, soy
Heat-treated plant food, such as cooked rice, beans, vegetables	Sliced melons, cut leafy greens, cut tomatoes
Anything with cheese	Untreated garlic-and-oil mixtures
	Sprouts

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. It was good to see local apples were being sourced.
- 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.
- The Buy American provision should be included in solicitations, contracts, and product specifications and is required whether food products are purchased by SFAs or entities which purchase on their behalf. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation. The Buy American statement was included in the procurement documentation provided during the review.

Reporting and Recordkeeping

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

- There are additional record retention rules for CEP. “SFAs (schools) must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

SBP and SFSP Outreach

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders home regarding the availability of the SBP multiple times throughout the school year. More information about potential breakfast service models as well as financial models can be found in the Serving up a Successful School Breakfast Program guide: <http://dpi.wi.gov/school-nutrition/school-breakfast-program>. For more ideas on breakfast menus, visit our ‘On, Wisconsin!’ cycle menu or look up menus for other schools in Wisconsin. Here are some Cycle Menu Resources: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu> and School Breakfast Menus on the Web: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>
- National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.
- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our website: <https://www.youtube.com/watch?v=aHR7eECbKaE>

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. USDA would like 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](#) on the [DPI Summer Meals website](#)
 - 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 website <http://www.fns.usda.gov/summerfoodrocks>.
- As part of the National School Lunch Program, it is required to do Summer Food Service Program (SFSP) outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

5. Other Federal and State Programs –Afterschool Snacks, Fresh Fruit and Vegetable Program, Special Milk Program, Wisconsin School Day Milk Program

Comments, Technical Assistance, and Compliance Reminders:

Afterschool Snacks

- Each site participating in the Afterschool Snack Program needs to receive a review within the first four weeks of operation, and a second review within the school year. The review form may be found on our website at: <http://dpi.wi.gov/school-nutrition/after-school>.
- Area Eligible Afterschool Snacks were claimed correctly at the free rate and the one not area eligible site was claimed correctly for free, reduced, and paid snacks.

Fresh Fruit and Vegetable Program

- As a reminder, nutrition education is essential to the success of the program but additional funding is not available through the grant to purchase nutrition education materials. Free materials can be ordered from the USDA’s Team Nutrition order form at <http://tn.ntis.gov>. Other materials can be accessed through the Wisconsin Team Nutrition website at http://ne.dpi.wi.gov/ne_nutred.

- Classroom teachers are allowed to participate with the students in the FFVP snack but that they are the only adults that are allowed to. Teachers can be powerful role models for students. While eating the FFVP snack with students, teachers have the opportunity to model healthy eating behaviors. This can be an effective way to reinforce nutrition education lessons and encourage reluctant students to try the snack. However, teachers are not required to participate and no additional funding is provided in the grant for teachers. If a classroom has both a teacher and a teacher's aide, the teacher's aide can be permitted to participate in the FFVP snack in place of the teacher if they have direct involvement with the students. See page 10 of the USDA's FFVP Handbook at <http://www.fns.usda.gov/sites/default/files/handbook.pdf> for more information.
- Offering a cooked vegetable can be allowable if certain criteria are met. This is mentioned on page 15 of the USDA's FFVP Handbook. The vegetable must be purchased fresh and cooked in house. Additional ingredients should not be added during the cooking process as the goal is still to connect students with the flavor of the actual vegetable. The vegetable that is cooked should be one that is not normally eaten raw and it must be offered as part of a nutrition education lesson. Cooked vegetables are limited to one time per week.

Findings and Corrective Action Needed

Finding:

Two household applications were determined incorrectly because one source of income listed on the application was missed. A ten day notice of adverse action of decreasing meal benefits must be sent to the households.

Corrective Action Needed:

The letter of decreasing benefits notice was sent on December 13, 2016. No further corrective action is required.

Finding:

The Federal non-program foods calculator was not completed. This calculator must be run each school year and kept on file. The DPI tool which can be used to complete the Federal non-program food calculator was reviewed. The minimum length of time to be used is five consecutive days of expenses and revenues.

Corrective Action Needed:

Non-food calculator was completed on site and no further corrective action is required.

Finding:

The Civil Rights no-discrimination statement printed on the monthly menus going home to households was not in the same size font of the rest of the document.

Corrective Action Needed:

Please provide a copy of the monthly menus documenting the font size for the Civil Rights statement is in compliance by January 20, 2017.

Finding:

Fruit roll ups were being sold ala cart in schools. This product does not qualify as being Smart Snacks compliant when entered into the calculator.

Corrective Action Needed:

Please provide a written statement this item will not be reordered when current inventory is used up by January 20, 2017

Finding:

The Afterschool Snack Program (ASP) must document and conduct two on-site monitoring's each school year. The first one must be done during the first four weeks of serving snacks. It appears this requirement was not completed and documented.

Corrective Action Needed:

Please provide a written statement the on-site monitoring of all ASP will comply with the four week and second monitoring requirement by January 20, 2017

Finding:

Signage that helps students understand what they can take as part of a reimbursable meal is required for both breakfast and lunch. This signage should be posted at or near the beginning of the service line and is required for schools. Resources for both service models, offer versus serve and schools without offer versus serve, can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>. Posters

can also be ordered for free using the order form at https://docs.google.com/forms/d/1rIGjKHSxkmtYtYsI4GuRiXL3NK3tEoZ-8JT-G9RKbgl/viewform?edit_requested=true. Make sure that whatever signage is used it is clear and consistent. The lunch signage at Horlick High School indicated students could take one fruit and one vegetable side. However, based on portion sizes, students could take two of each. At McKinley Middle School, some lunch signs indicated one fruit side and one vegetable side while other signs indicated two fruit sides and two vegetable sides.

Note that signage is not required for field trips, breakfast in the classroom and other venues where signage may be problematic. However, other methods should be used to inform students what choices they have. This verbiage can be found in the offer versus serve guidance at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>.

Corrective Action Needed: Submit examples of signage that will be posted at the elementary, middle, and high schools.

Finding

The hamburger bun used for the hamburger bar at Horlick High School on the day of meal observation credited as a 1.75 oz. eq. grain. This resulted in the hamburger option not meeting the daily minimum requirement of a 2 oz. eq. grain for students in grades 9-12.

Corrective Action Needed:

This was corrected prior to service by offering another grain option with the hamburger. Following meal observation, another hamburger bun product which credits as a 2 oz. eq. grain was identified as a replacement and the product information was submitted for review. The product information for the 2 oz. eq. bun is adequate and corrects the issue. No further corrective action is required.

Finding:

The cottage cheese and fruit plate offered as an entrée option at Horlick High School did not meet daily minimum grain requirements as it only came with a 1 oz. eq. dinner roll.

Corrective Action Needed:

This was corrected prior to service by offering another grain option with the cottage cheese and fruit plate. Moving forward, the cottage cheese and fruit plate will be offered with 2 dinner rolls that each credit as a 1 oz. eq. grain. No further corrective action is required.

Finding:

It is unclear whether or not the weekly vegetable subgroup requirements for lunch were met during the review week based on observations at Horlick High School and McKinley Middle School. At Horlick, the hot vegetable options were not offered consistently on all service lines. At McKinley, one of the hot vegetable options was only offered on one service line. When crediting vegetables toward vegetable subgroup requirements, all student regardless of entrée choice must be able to have access to those vegetables.

Corrective Action Needed:

Submit a written statement addressing how vegetable subgroup requirements will be met moving forward on all service lines at Horlick High School and McKinley Middle School.

As discussed at the exit conference, it is understood that prompt corrective action is required for the findings identified above. Part 210.08 of federal regulations requires fiscal action to be calculated for critical violations to reclaim of unearned reimbursement. In addition, withholding of program payments is required if documentation of corrective action is not received within 30 days of the date negotiated at the exit conference, or as later extended upon written request if extraordinary circumstances delay completion of corrective action within the originally negotiated timeframe. Uncorrected errors are subject to reclaim for the entire school year.

Section 207 of the Healthy Hunger Free Kids Act amended section 22 of the NSLA (42 U.S.C.1769c) to require State agencies to report the final results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. The final rule at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency's publicly available website, and the SFA is strongly encouraged to post a summary on the SFA's public website. A summary of this review will be made publicly available on the SNT website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> within 30 days of the SFA receiving the final AR report.

Signature of Authorized Representative

12/16/2016
Date of Exit

January 20, 2017
Negotiated Corrective Action Date

Signature of Food Service Director

Signature of Nutrition Program Consultant

Signature of Public Health Nutritionist

