

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

School Food Authority: Richland School District

Agency Code: 524851

School(s) Reviewed: Lincoln Elementary School

Review Date(s): 1/28-29/19 & 2/11/19

Date of Exit Conference: 2/11/19

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 for the week. 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 Richland School District for the courtesies extended to us during the on-site review and for being flexible with the rescheduling due to the weather. 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

A sample size of 394 students were reviewed who were receiving free and reduced benefits during the month of December. Out of the sample size, only three students were receiving the incorrect benefits.

Public Release

SFA sent out the Public Release to multiple places. Great job!

Direct Certification

SFA was running direct certification frequently.

Verification

SFA completed the Verification process correctly and submitted the Verification Collection Report for the 2018-2019SY.

Meal Counting and Claiming

SFA compared the Daily Activity Report to the Accuclaim but used the Daily Activity Report for counting and claiming. The Daily Activity Report was used because the Accuclaim did not take into account households who paid in cash.

At Lincoln Elementary, the teachers took a lunch count in the morning to see if the students were having hot or cold lunch. The counts were then given to the food service staff. During lunch service the SFA did not check students off as they took a reimbursable meal, but double checked the forecast to make sure their students had a meal. Forecast counts were used for claiming. Since it was a small school and the school served all five components, the lunch staff would make sure every student had all five items on their tray before leaving the service line.

Claims for SMP and WSDMP were validated as well. The site selected for review was Lincoln Elementary School which only goes up to 4k. The FSD did a great job with setting up programs so that the meals and milk were not being over claimed between the 4k and childcare.

MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Richland Center's AR was rescheduled due to weather. We thank food service staff and admin for their flexibility and cooperation. Lincoln Elementary does a great job following the CACFP meal pattern. Thank you for organizing and sending requested documentation in a timely fashion. Meals are tasty and colorful. All meals observed were reimbursable. Staff members are knowledgeable and friendly. Keep up the good work!

Comments/Technical Assistance/Compliance Reminders

Signage: The CACFP meal pattern does not require signage to be posted in the meal service line.

Chicken patty: It is not required to serve Pre-K students a bun on days a chicken patty (2 oz eq m/ma, 1 oz eq grain) is served.

Ordering/Forecasting/Transport: Lincoln Elementary ran out of chicken patties and buns during lunch service on 2/11/2019. Five students were served fruit and milk and then called back to receive vegetables and the sandwiches once more chicken patties and buns arrived from the high school. Servers should assess the quantity of components halfway through meal service to ensure each student is offered the proper amount of each component. If staff assess a component shortage, immediate corrective action should be taken by either calling the high school for more of the required component or by having a small stock in-house in case of emergencies. If timing does not allow for delivery of additional food, offering the remaining food but not claiming reimbursement for the meal is an option. It is highly recommended that you develop some type of tracking form which may improve the accuracy of meals orders compared to actual meal counts. Food shortages do not improve or maintain participation rates, and the school potentially loses out on reimbursement.

Food Buying Guide: Baked cod fillets were served during the week of review. For crediting information please see "Seafood, fresh or frozen, Fish Fillets" in the [USDA Interactive Food Buying Guide](https://foodbuyingguide.fns.usda.gov/Home) (<https://foodbuyingguide.fns.usda.gov/Home>).

2. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

The Nonprofit School Food Service Account was not triggered for a comprehensive review.

Unpaid Meal Charge Policy

SFA had a policy on file.

Paid Lunch Equity

SFA completed the PLE survey and had a positive balance during January of 2018. Based USDA's PLE exemption guidance, Richland School District was except from having to raise the cost per meal for the 2018-2019 SY.

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.

3. GENERAL PROGRAM COMPLIANCE

Civil Rights

SFA was following USDA civil rights regulations. Staff were training annually on civil rights and the self compliance form was completed before October 31st.

On-site Monitoring

Completed for the 2018-2019 SY.

Local Wellness Policy

SFA had a local wellness policy on file but it was missing information about the triannual assessment and public involvement.

Smart Snacks

At the time of the on-site review there were no competitive foods or beverages sold at Lincoln Elementary School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Professional Standards

Professional standards requirements were being met. The FSD did an excellent job with updating the professional standards tracker after each training. Technical assistance was provided to write the number of hours needed for each staff member and the FSD corrected it right away.

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. Food safety inspections were on file.

Buy American

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products.

The Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

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. More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the [SNT Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Reporting and Recordkeeping

Records kept on file for 3 years plus the current.

4. OTHER FEDERAL PROGRAMS REVIEWS

Summer Food Service Program (SFSP) Outreach

SFA participates in this program during the summer.

Fresh Fruit and Vegetable Program (FFVP)

FFVP at Jefferson Elementary was observed. The program was excellent and well administered. The FSD gave each teacher a lesson plan and all of the teachers’ tailored it to their age group. The kids loved the activities and trying the new foods.

Special Milk Program (SMP)

SMP was observed at Lincoln Elementary for the students in childcare. Students were given their milk with midmorning snack. Teachers were engaging with the students.

Wisconsin School Day Milk Program (WSDMP)

WSDMP was observed at Lincoln Elementary for the students with access to NSLP. Students had a milk with their mid-afternoon snack.

Corrective Action Needed

1. MEAL ACCESS AND REIMBURSEMENT

Findings and Corrective Action Needed: Counting and Claiming

Meal Access Finding #1: Three students were issued incorrect benefits.

Corrective Action Needed #1: Send the household the adverse action that was sent to the SFA via e-mail. For a better benefit, change the benefit within 3 days. For a lesser benefit, change the benefit after 10 days. Send a copy of the letter sent to the households to the Nutrition Program Consultant by e-mail once completed.

Meal Access Finding #2: Inaccurate point of sale. Lunches claimed are based on a forecast count and by backing out those that did not take a meal from the forecast.

Corrective Action Needed #2: Correct the point of sale and retrain staff. Submit a statement explaining the new system along with a training roster of staff that attended.

Meal Access Finding #3: SFA compared the Daily Activity Report to the Accuclaim but used the Daily Activity Report for counting and claiming. The Accuclaim did not take into account households who paid in cash.

Corrective Action Needed #3: Work with the software company to set up the correct parameters in the Accuclaim so that all reimbursable meals served are accounted for. Submit a copy of the corrected Accuclaim, along with a copy of the Daily Activity Report for the month of either February or March.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

***Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*

Meal Pattern Finding #1: Unallowable cereals in CACFP

Cereals served in CACFP cannot contain more than 6 grams of sugar per dry ounce. The following cereals are served to students at Lincoln Elementary during the week of review are unallowable:

- Golden Grahams
- Chocolate Mini Wheats
- Lucky Charms
- Trix
- Cocoa Puffs
- Fruit Loops
- Apple Jacks
- Frosted Mini Wheats

Corrective Action Needed for Finding #1: Find substitution items and submit crediting documentation. *Corrected prior to on-site review, no further action required. Replaced with Rice Krispies, Multigrain Cheerios, and Corn Flakes.*

☒ Meal Pattern Finding #2: Standardized recipes

Standardized recipes are required for all menu items that have more than one ingredient. 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 in each production kitchen to reflect the products and practices that are used in that 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>). The following were made during the week of review and do not have a standardized recipe:

- Sloppy joes
- Cookie
- Roll

Corrective Action Needed for Finding #2: Submit standardized recipes for the items listed above. *Corrected on site, no further action required.*

☐ Meal Pattern Finding #3: Milk not on production record December 13

Milk is a required component as part of the National School Lunch Program (NSLP). You must record daily usage by milk type on your production records (e.g., skim chocolate milk, 1 percent white milk).

Corrective Action Needed for Finding #3: Please submit 3 consecutive days of breakfast and lunch production records with milk usage by type recorded.

☐ Meal Pattern Finding #4: Grain based desserts are not allowed in the CACFP meal pattern. Mini Cinnis were served during the week of review, and credit as a “sweet roll,” which is a grain based dessert.

Corrective Action Needed for Finding #4: Submit crediting documentation (PFS, CN label, USDA Fact Sheet) for a non-grain based-dessert item to replace Mini Cinnis served at Lincoln Elementary for breakfast in the futures. If applicable, submit a standardized recipe.

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: Nonprogram Food

RM Finding #1: SFA did not complete the Nonprogram Foods Revenue tool for the 2018-2019 SY.

Corrective Action Needed #1: Complete the Nonprogram Foods Revenue tool for the 2018-2019 SY and submit a copy to the Nutrition Program Consultant.

Findings and Corrective Action Needed: Annual Financial Report

RM Finding #2: On the Annual Financial Report, there was a negative balance at the end of the 2018 SY in Nonprogram foods. However, based on the Nonprogram Food Revenues Tool, the SFA has the prices set high enough to cover Nonprogram Foods.

Corrective Action Needed #2: Review the 2017-2018 Annual Financial Report to assure that funds were properly allocated. Submit a statement of understanding the Nonprogram Foods cannot be negative and would need an end of the year fund transfer and explanation for the discrepancy.

4. GENERAL PROGRAM COMPLIANCE

Findings and Corrective Action Needed: Wellness Policy

GP Finding #1: SFA had a Wellness Policy on site with all but a few of the required components, including the triannual assessment and public involvement.

Corrective Action Needed #1: Submit a timeline for when the SFA plans to update the Wellness Policy.

Findings and Corrective Action Needed: Buy American Provision

GP Finding #2: Non-domestic documentation

There was no documentation for non-compliant items at Richland High School (the prep site for Lincoln Elementary) during the time of review. It is required to document non-domestic items. TA was provided to the FSD during the joint review (Ithaca).

Corrective Action Needed for Finding #2:

Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. **Provide a copy of the form(s) that will be used and include any noncompliant products.** A suggested [Buy American - Non Compliant Product List template](#) can be found on the Buy American webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

5. OTHER FEDERAL PROGRAMS REVIEWS (NO FINDINGS)

Carolyn Stanford Taylor, 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 your students' success.

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

