

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

School Food Authority: Beloit School District

Agency Code: #53-0413

School(s) Reviewed: Fran Fruzen Intermediate, Robinson Elementary, Converse Elementary

Review Date(s): February 6-9, 2018

Date of Exit Conference: February 8, 2018

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at the Beloit school district for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very

receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet school nutrition program regulations.

The Beloit School District should be commended for their outreach efforts to ensure that children have access to summer meals. The district operates several summer feeding sites and spend a significant amount of time informing the public. Outreach activities include participation in the Annual Memorial Day parade to distribute summer meals flyers with locations and times, distribution of flyers in several grassroots organizations and promotion and publicity in local media and in their schools. Kudos to the district for their commitment to ensuring that students have access to healthy meals during the summer months.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Community Eligibility Provision (CEP)

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- [USDA Community Eligibility Provision guidance](http://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) has been expanded in memo SP 54-2016 (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.

Finding: The Roy Chapman Andrews Academy is listed as an operating school in the DPI school directory. This charter school is not included in any of the groups approved for CEP. On the CEP application it appeared that this school had been consolidated with another CEP site which does appear on the application.

Corrective Action Required: It appears that the district determined after the CEP application was submitted to continue to operate this school as its own entity. Because the students are included in an appropriate DC run for this year and the SFA is completing the final year of the CEP cycle, the state agency approved their participation for the remainder of the school year. Next school year this site will need to be included as a site under its assigned school name with a separate DC run. No further CA at this time. The SNT will work with the district to correct this for school year 2018-19.

Meal Counting and Claiming

Technical Assistance (TA)/Compliance Reminders

- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission. The edit check is required for all SFAs and must be monitored to ensure that accurate claims are submitted. Schools that contract food service from an outside vendor are required to have a representative of the district conduct the monthly edit check.

- Schools must ensure that all meals claimed for reimbursement are counted at the point of service (POS) as the student receives the meal. Schools that adopt alternate meal service models such as breakfast in the classroom or offer meals for field trips must ensure that the POS counts include only reimbursable meals and are counted as the student receives it.

Finding: The SFA has not completed the edit check process prior to submission of claims. The software edit check document includes students classified as paid and reduced despite all sites participating in CEP.

Corrective Action Needed: Please submit an appropriate edit check document with this corrective action response for February 2018. The document should include the software accuclaim documents for all programs showing that all students are free. Calculations may be completed at the bottom of the document showing the attendance factor. A [manual edit check document](#) for CEP schools may be downloaded on the CEP webpage, under the Monitoring and Claiming heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>). As a reminder the edit check needs to be completed by a representative of the district and may not be completed by an employee of the food service management company.

Technical assistance was provided during the onsite review to assist Beloit SD in understanding the requirements for the edit check for schools participating in CEP.

Finding: Breakfast counts at Fran Fruzen intermediate school are inconsistent and unreliable. During meal observation in several classrooms it was determined that many students were counted for breakfast without the required fruit or vegetable options and/or left the serving area with only a milk or a juice. In other classrooms the students weren't counted until after they were seated and consuming the meal. In one classroom the adult monitoring the meal stepped outside the classroom to chat with another adult. The system in place is not meeting the intent of the USDA Child Nutrition Programs to provide and submit reimbursement claims for meals that meet meal pattern requirements.

Corrective Action Needed: The district must develop an alternative system of meal counting during breakfast to ensure that counts are accurate and meals are only claimed for students that accept the required number of components. This error falls under Performance Standard I of the administrative review process and requires fiscal action. Please send thirty consecutive days of accurate breakfast counts in Fran Fruzen schools along with a statement indicating the steps the district has taken to ensure accurate monitoring of meals at breakfast. A recalculation of meals will be conducted and fiscal action assessed for meals claimed without an acceptable POS as well as observed meals during the onsite review that didn't include adequate components. Please note that USDA allows a \$600 disregard by program for fiscal action before repayment must be made.

Technical assistance was provided during the onsite visit to assist staff in adopting a counting method that will ensure accurate meal counts each day. As a result all intermediate schools in the Beloit School District will have students come to the cafeteria to receive their breakfast and then proceed to the classroom to consume it. Future options may also include investing in Kiosks to take the meals to the hallways where student classrooms are located. Beloit nutrition staff will monitor the meals.

Finding: There appeared to be some confusion by some of the staff during breakfast in the classroom over what constitutes an accurate POS count. While all observed breakfasts included the correct number of items including the required fruit or vegetable, it was noted that in a couple of classrooms students weren't counted or marked off until after everyone was seated and consuming the meal.

Corrective Action Needed: Please submit a detailed statement indicating the steps Beloit School District will take to ensure that everyone involved with monitoring breakfast in the classroom understands the meal pattern requirements and how to maintain an accurate POS.

It must be noted that the overall integrity of the counting system for breakfast at Converse school is intact. It appears that additional training of staff on the requirements of the program and importance of counting meals as the student leave the line would correct this issue. Because this occurred in a very limited number of classrooms with no non-reimbursable meals observed fiscal action will not be assessed.

During the onsite visit the majority of classroom monitors did an excellent job of ensuring that meal counts were taken as the students accepted their breakfast.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff at Beloit School District for your cooperation during this Administrative Review (AR). Thank you to the Food Service Director and kitchen manager for sending documentation prior to the review as well as onsite as this helped expedite the process. The kitchen staff worked well together and answered questions in a pleasant manner. They also had a good understanding of Offer versus Serve (OVS) to help kids make a reimbursable meal. All kitchens and service areas were clean and well-organized, which enhanced students' dining experience.

Great job to Beloit School District for following the new Child and Adult Care Food Program (CACFP) meal pattern for both breakfast and lunch. This is a model district for how the new regulations can be followed successfully. The district also does a great job eliminating canned fruits and vegetables, only offering fresh, frozen, or dried fruit and fresh vegetables. Thank you for serving healthy, nutritious meals to the students of Beloit School District.

Comments/Technical Assistance/Compliance Reminders

Production Records

Production records document that foods served to students meet meal pattern requirements. For this reason, it is important to be specific about menu item description and serving sizes. During the week of review, there were a few menu items written such as "Spicy Chix" and "Chix Nug" without a recipe and/or item number, serving size, planned number of servings, or crediting. This makes it unclear for staff to understand how much to serve each student. It also makes it confusing when forecasting for future meals. Continue to work with all staff members on filling out production records completely. Please refer to the [Production Record Requirement list](#) found on our [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Menu Substitutions

Any changes to the planned menu must be documented on the production record. A substitution should be a food that credits comparably to the original planned item, have a similar nutrition profile, and belong to the same vegetable subgroup (when applicable) to the extent practicable. It was noted that during the week of review (December 4-8, 2017), celery or cucumber was substituted for broccoli, or broccoli was substituted for carrots. This did not result in a vegetable subgroup shortage, however, without careful consideration of these substitutions, they could result in weekly vegetable subgroup shortages.

Crediting Documentation

The Land O' Lakes cheese sauce served at all sites does not have a valid CN label, therefore is not able to be credited. This did not result in a meat/meat alternate shortage. Nonetheless, if you wish to credit this product, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the *USDA Food Buying Guide* for School Meal Programs. It is important to save actual CN labels from product packaging that include these four things. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label. It is encouraged that you contact the manufacturer to see if a valid CN label or product formulation statement is available for this product.

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.

At Fran Fruzen Intermediate, the following recipes need to be updated:

- Sub AP CHam - ham is listed twice in the ingredient list; cheese is added to the sandwich but not accounted for in the ingredient list.
- Burrito/Taco recipes - update to reflect actual kitchen practices for filling, scoop number and tortilla size used.
- Corn - due to the addition of spices to the corn, a standardized recipe is needed to ensure it is prepared the same each time.

Additional resources can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Whole Fruit

While it was great to see so many fruit options at Fran Fruzen Intermediate, it is recommended to incorporate more cut fruit into your menu options. Reviewers noted that many students took whole oranges to comply with the 1/2 cup fruit/vegetable requirement under OVS, yet many whole orange were thrown out or put on the donation table. Children tend to eat more fruit when it is easily accessible to them. By cutting up the oranges, they may be more likely to try and actually eat the fruit. Reviewers think this would be especially beneficial for the younger grades, as peeling whole oranges can be difficult for tiny hands.

Whole Grain-Rich

As a reminder, 100% of your offerings for breakfast and lunch must be whole grain-rich (WGR). This includes processed entrée items as well as additional grains like croutons, pasta and rice. Grains that are not whole grain-rich cannot be credited toward the grain component. The croutons served at both Robinson and Converse Elementary on the Chicken Caesar Salad were not whole grain-rich. Even though this did not result in a grain shortage, the croutons cannot be credited toward the meal pattern. Additional information on WGR, including how to determine if a product is WGR, can be found in the [USDA Whole Grain Resource](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#grain) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#grain>).

Printed and Electronic Menus

The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the lunch menus associated with the review sites. The SFA may choose to list milk variety each day or may include a statement on the menu that says a variety of milk is offered daily as part of the reimbursable meal.

Reimbursable Meal Signage

The National School Lunch Program (NSLP) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit-priced reimbursable meal at breakfast and lunch. When implementing OVS, schools must also identify what a student must select in order to have a reimbursable meal, which includes the requirement to take at least a 1/2 cup fruit, vegetable or a combination of fruit and vegetable.

Robinson and Converse Elementary did not have any signage in the cafeteria indicating the requirement for a 1/2 cup fruit and/or vegetable.

Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Breakfast in the Classroom (BIC)

Breakfast service was observed at Fran Fruzen Intermediate and there appeared to be many inconsistencies with how meal claiming and OVS were implemented.

Twenty-one non-reimbursable breakfasts were noted during on-site observation. TA was given to the Food Service Manager for ideas on how to change the breakfast service, which included moving it to the cafeteria and allow students to return to their classrooms to eat their meal. This way, food service will be able to monitor OVS and that all meals are reimbursable.

Converse, on the other hand, administered a commendable Breakfast in the Classroom (BIC) service. Teachers were knowledgeable of OVS guidelines, and students received their meals in an orderly fashion.

Offer versus Serve (OVS)

Under OVS at breakfast, students are required to have at least three food items on their trays, one of which is ½ cup fruit, vegetable, or a combination. Although OVS is not required for grade K-8 students, it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Visit the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) page for additional OVS guidance (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs) is also a valuable resource (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>).

Child and Adult Care Food Program (CACFP)

The updated CACFP meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains,

and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

Thank you to the Food Service Manager, kitchen staff, and teachers at Robinson and Converse Elementary schools for correctly following and implementing the updated CACFP meal pattern. Robinson kitchen staff did an excellent job at removing the chocolate milks during lunch service and ensuring that students have every component on their trays. Teachers observed at Converse Elementary are also correctly following the updated CACFP meal pattern for Breakfast in the Classroom. Keep up the great work!

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ Finding #1: There was a weekly grain shortage at Fran Fruzen Intermediate during the week of review for lunch. A total of 6.75 oz. eq. grain was offered during the week, but 8 oz. eq. grain is required for the K-8 meal pattern. It is unclear if the chicken nuggets, served 12/4, 12/6, and 12/7 were served with another grain or not as there was no bread listed on production records.

Corrective Action Required: Please state what you will do to the week of review so that the minimum weekly requirement of 8 oz. eq. grain is offered to K-8 students.

❑ Finding #2: Lunch menus at all reviewed schools did not list milk choice.

Corrective Action Required: Update all lunch menus and send a picture or PDF of the signage that has been posted.

❑ Finding #3: Croutons served on the Chicken Caesar salad served at both Robinson and Converse Elementary are not Whole Grain-Rich.

Corrective Action Required: Replace product with a Whole Grain-Rich alternative or discontinue use of the product. Submit a written statement with your plan of action and a nutrition facts label and/or a Product Formulation Statement if you choose to offer a replacement product.

❑ Finding #4: Robinson and Converse Elementary did not have signage that mentioned the 1/2 cup fruit/vegetable requirement.

Corrective Action Required: Update signage to include the following: Build a complete meal by selecting foods from at least 3 groups, including a ½ c of fruit, vegetable, or a fruit/vegetable combination. Send a picture or PDF of new or supplemental signage that has been posted.

SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

Foods and beverages sold in schools must meet both the Smart Snacks general and nutrient standards. If multiple grades have access to a la carte foods and beverages, all products must meet Smart Snacks standards for the youngest age/grade group. At Fran Fruzen Intermediate there was a 10 fl.oz 100% juice bottle available to all age/grade groups. Elementary students can only be offered 100% juice in a 8

fl.oz bottle or smaller, therefore the 10 fl.oz bottle size must be discontinued immediately or restricted to 6-8 only.

We recommend using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](#), found on the Smart Snacks webpage to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Robinson and Converse Elementary did not sell any competitive foods or beverages during the school day. 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>).

Findings and Corrective Action Needed: Smart Snacks

Finding: 10 fl.oz bottle of 100% juice is not compliant with Smart Snacks guidelines for the Elementary age students.

Corrective Action Needed: Discontinue use of the 10 fl.oz bottle of 100% juice. You may offer a smaller bottle size (≤ 8 fl.oz), remove it as an a la carte option during elementary service times or discontinue the product altogether. Submit a statement indicating your plan going forward.

Fresh Fruit and Vegetable Program

Commendations

Thank you to Beloit School District for all of your hard work on the Fresh Fruit and Vegetable Program (FFVP). The monthly FFVP menu is spectacular! The pictures of the snacks, the fun facts, and the great variety offered are fantastic.

Comments/Technical Assistance/Compliance Reminders

Labor Tracking

There currently is not a system in place to keep track of operating and administrative labor tasks completed during the hours charged to the FFVP grant. Staff working on FFVP must be able to demonstrate that the amount of time charged to the grant is at least the amount of actual time worked on the grant. Suggested supporting documentation includes: a schedule that reflects actual work tasks, personnel activity reports, or any type of time tracking system that details what work was done. The supporting documentation must be such that an individual reviewing it could be reasonably assured that the costs were accurate and properly allocated. A system for tracking and documenting operating and administrative labor expenses will need to be developed. A FFVP [Employee Time Sheet](#) template can be found on the FFVP webpage (<https://dpi.wi.gov/school-nutrition/ffvp>).

On-site observations

While observing one classroom, it was excellent to see the teacher introduce the fruit to the students prior to having the students taste it. In addition, the teacher had the students participate in hand washing and passing out of napkins to fellow classmates. The teacher had the students all bite into the plum on the count of 3. The students appeared very interested in the activity, and because everyone

was involved, everyone took at least one bite of the plum. Afterwards, the teacher encouraged the students to describe the taste. The short lesson and snack time was interesting and engaging for students. Well done!

While observing FFVP service at Robinson, many teachers noted that service time was not until the end of the day because the students eat a late lunch. The FFVP service time is at each teachers' discretion. If teachers feel it would be more beneficial to offer the FFVP earlier in the day, after breakfast and before lunch, this is allowable. Encourage your teacher to discuss options with the Food Service manager. Consider changing FFVP delivery and service to the afternoon, which may increase participation.

Findings and Corrective Action Needed:

Finding: While documentation was provided for FFVP operating and administrative labor hours, documentation was not available for the tasks that were performed during the operating and administrative labor hours claimed.

Corrective Action Needed: After submitting the March 2018 claim, submit supporting documentation for operating and administrative labor for Robinson Elementary to the FFVP Public Health Nutritionist. Supporting documentation includes labor reporting that shows a reliable system is now in place to track tasks completed during labor hours claimed. *This corrective action will be outside of the Administrative Review process and will take place before the March 2018 claim is paid.*

Buy American

Comments/Technical Assistance/Compliance Reminders

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs.

Labels should indicate if the product is grown, processed and/or packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above. Any substitution of a non-domestic product for a domestic product (which was originally a part of the Request for Proposal (RFP)), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.

More information on this new requirement, including a [Non-Compliant Product Tracking Sheet](#), can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Corrective Action Required

Finding: The following products were deemed non-compliant with the Buy American Provision:

- Converse Elementary:
 - Bananas - product of Costa Rica
- Fran Fruzen Intermediate:
 - Red Peppers - product of Mexico
 - Zucchini Squash- product of Mexico
 - Frozen Crinkle-sliced Carrots - product of Canada
 - Frozen Green Peas - product of Canada
 - Frozen Corn - product of Canada
 - Bananas - product of Mexico

Corrective Action Needed: Begin using a [Non-compliant Product List](#) for tracking non-domestic products. Provide a copy of the form that will be used and include any non-compliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. This template is located on the procurement webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

3. RESOURCE MANAGEMENT

Annual Financial Report

Comments/Technical Assistance Nonprofit School Food Service Account

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- 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”. While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.

Finding: The beginning fund balance on July 1, on the 2016-2017 Annual Financial Report does not match the ending fund balance on June 30 of the 2015-2016 school year. The audited report was correct. The issue was the result of a math error during the 2014-2015 school year.

Corrective Action Needed: An amended annual financial report was submitted to DPI during the onsite review. Thank you for your quick response to the error. No further corrective action is required.

Finding: The school has a fund balance exceeding the three months operating costs allowed by USDA to maintain the school nutrition program on a non-profit basis.

Corrective Action Needed: The district is preparing a plan to address the surplus. Expenditures will be made to upgrade the school nutrition computers and software at each location, make kitchen improvements and update older equipment. Once the plan is complete submit it to DPI following the guidance on the excess cash balance notification sent on February 8, 2018.

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)/Compliance Reminders

- 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.
- 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.
- 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).

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

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf)
- [Nonprogram Foods In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf)

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

Finding: The Nonprogram Foods Revenue Tool has not been completed for the current school year.

Corrective Action Needed: Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool for Albany School District using a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

(TA)/Compliance Reminders

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 updated in 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 or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program including administrative staff involved with the benefit issuance process and faculty members involved in meal counting at the POS.

Finding: The non-discrimination statement is not included on the district website.

Corrective Action Needed: This was corrected during the onsite review. Thank you for your prompt response to this corrective action requirement. No further corrective action is required.

Finding: The district has not completed Civil Rights training for staff monitoring breakfast in the classrooms or administrative staff working with student information related to the school nutrition programs.

Corrective Action Needed: Please review a copy of the [Civil Rights Power Point](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>) and submit an

[Attendance Record](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) document with signatures of participants (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

Local Wellness Policy

Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Content of the Wellness Policy

At a minimum, the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.
- An assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Local Wellness Policy

Finding: The SFA's local wellness policy included an updated review date of 2014. The policy as it stands includes meets some but not all requirements as stipulated above (1000). While the Obesity

Prevention group offered an assessment of the policy in 2014, there remains work to bring the policy in line with current regulations.

Corrective Action Needed: Please provide a timeline for updating your policy and/or provide a copy of the updated policy, if the board approves it prior to the corrective action date. Include a statement indicating how the district plans to invite and include stakeholders in the process, inform and make the policy and subsequent assessments available to the public and review and update the policy as required under USDA regulations. The [Local Wellness Policy Checklist](https://dpi.wi.gov/school-nutrition/wellness-policy) provides the tool that will assist in ensuring that policy requirements are met (<https://dpi.wi.gov/school-nutrition/wellness-policy>).

Professional Standards

Comments/Technical Assistance (TA)/Compliance Reminders

- 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.

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

[A Flash of Food Safety](http://www.fns.usda.gov/ofs/food-safety-flashes) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Findings and Corrective Action: Food Safety

Finding: The most recent food safety inspection report is not posted in a publicly visible location.

Corrective Action Needed: Post most recent food safety inspection report in location visible to public. Completed on-site. No further action required.

Finding: Fran Fruzen Intermediate and Converse Elementary have implemented Sharing/"No Thank You" tables without prior approval from DPI SNT. Please note:

Students were observed placing items on the Sharing/"No Thank You" table after they finished lunch. This poses food safety concerns as it's difficult to monitor how students are handling food on their tray once they have left the serving line. Schools must have a documented monitoring system in place to ensure items are safe for consumption.

Corrective Action Needed: Provide the DPI SNT with a plan as to how the SFA will maintain the safety of food served to students at all grade levels. Reference [DPI's Sharing/"No Thank You" Tables memo](#) for required details. Additionally, develop a Standard Operating Procedure (SOP) for the Sharing/"No Thank You" tables before they are implemented.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure student success.

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



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