

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

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<b>School Food Authority:</b> New Richmond School District	<b>Agency Code:</b> 553962
<b>School(s) Reviewed:</b> 60-New Richmond High School	<b>Review Date(s):</b> 4/3/19
<b>Review Team:</b> TCB Reviewers	<b>Date of Exit Conference:</b> 4/3/19
<b>Corrective Actions Due Date:</b> 5/8/19	

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. 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 New Richmond School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The TCB review team appreciates the eagerness of the staff at New Richmond School District for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, local wellness, and overall responsiveness to recommendations made while on site. We were impressed at the overall cleanliness of the kitchen and the courteousness of staff toward students.

The TCB review team is confident that New Richmond School District will continue to improve their knowledge and operation of child nutrition programs.

<b>Commendations</b>
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**Commendation #1:** *The SFA's Food Service Director was very well prepared for the on-site review, and all off-site requests for information were received in a timely fashion.*

**Commendation #2:** *The food offered to students was of high quality, and looked fantastic. Students seemed very satisfied with the level of food quality as well as the customer service provided by the site staff.*

**Commendation #3:** *A strong level of adult participation was observed at lunch; this is a great sign of a well-run program.*

## Required Corrective Actions

Please review and reply to this Corrective Action Plan to identify procedures and/or documents needed to correct these issues.

**Finding #1:** *The meal counting and claiming system for the Bridge Program does not follow program requirements necessary to ensure accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the student received their reimbursable meal. During the offsite it was determined that the SFA was counting "Bridge Program" reimbursable meals during the point of preparation rather than at the point of service.*

**Required Corrective Action #1:** *Prior to the date of onsite, the SFA corrected the meal counting process to ensure meals were tracked as each student received their meal. The SFA also added this as an additional site to the Schedule A and updated meal counting and claiming procedures to include meals being claimed after a reimbursable meal has been taken by students. Staff were trained on the updated meal counting and claiming procedure and observation on the day of review confirmed corrective action had been implemented successfully. [Corrective Action was completed prior to on-site; no further action is necessary.]*

**Finding #2:** *SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The following food storage violations were observed: Date-marking items that are removed from the original packaging is not occurring consistently.*

**Required Corrective Action #2:** *Implement an SOP for date-marking. Train staff on the SOP and submit proof of the training as corrective action.*

**Finding #3:** *The SFA did not meet the requirements of the Buy American Provision in accordance with 7 CFR 210.21(d). The SFA did not consistently follow the procedure to monitor the vendor's performance of the Buy American Provision as written in their current contracts.*

**Required Corrective Action #3:** *The SFA must more consistently follow their procedure to monitor vendor performance. The procedure includes: 1) how the SFA will monitor the country of origin on product labels when receiving deliveries in order to identify and address non-domestic products, and 2) how the SFA will periodically monitor storage facilities, refrigerators, freezers, dry storage and warehouses to ensure they are receiving domestic products or products that meet the procurement contract exceptions. [Corrective Action was completed on 4/4/19; no further action is necessary].*

**Finding #4:** *Finding: The SFA/LEA did not meet the minimum requirements for all foods and beverages sold in schools in accordance with 7 CFR 210.*

**Required Corrective Action #4:** *The SFA should submit a plan to ensure all foods and beverages sold on the school campus (excluding reimbursable meals), during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day), meet regulatory requirements. This includes a la carte items sold during meals, and foods/beverages sold in vending machines, school stores, and any other venue; and State-set fundraising limits meet regulatory requirements (school fundraising limits are being properly followed). [Corrective Action was completed on 4/3/19; no further action is necessary.]*

**Finding #5:** *The nondiscrimination “And Justice for All” poster is not located in the meal service area and/or not visible to students. (FNS Instruction 113).*

**Required Corrective Action #5:** *Provide a statement and or image of how this requirement will be met. If corrected while onsite, no further action required. [Corrective Action was completed, and a photo was provided on 4/4/19; no further action is necessary].*

**Finding #6:** *Menu signage did not include that students take at least 1/2 cup fruit, vegetable, or combination.*

**Required Corrective Action #6:** *All signage posted must include the requirement that students take at least 1/2 cup fruit, vegetable, or combination. Submit a photo of signage that fulfills this requirement.*

**Finding #7:** *Finding: Offer vs. Serve was not properly implemented at the alternate serving location run by the reviewed school. All entrees were presented with a pre-selected vegetable, then all other components were selectable.*

**Required Corrective Action #7:** *Set forth a process whereby all components are selectable by the students, to include at least 3 components, two of which must be full components, and one of which must be at least a 1/2 cup fruit or vegetable. [Corrective Action was completed, and a plan provided on 4/4/19; no further action is necessary].*

## Recommended Technical Assistance

Please review the following Technical Assistance; a response is not required. Internally, identify procedures and/or documents needed to work toward continuous improvement of the program. Please note, numbers below may not correspond directly to numbered findings above.

**Technical Assistance #1:** *Implement a meal counting and claiming procedure that yields meals being accurately claimed at the they are served for reimbursement. Discussion was had the director to utilize a roster that will be "checked off" at the point when the meal is reimbursable, and the meal count then provided to the cafeteria staff to be entered in the POS.*

**Technical Assistance #2:** *An SOP for date-marking should be included and implemented in the food safety plan. Staff should be trained on the food safety plan SOP and follow-up should be done to ensure date-marking is being done by staff.*

**Technical Assistance #3:** *The DPI website provides guidance regarding [Buy American](#), including a template policy, the justification form called "Buy American - Noncompliant Product List" and other resources. (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>)*

**Technical Assistance #4:** *Items being sold as a la carte and side items from the reimbursable meal must be measured for compliance with Smart Snack requirements. The only items exempt from measurement are the entrée that is offered the day of or day after. Measuring the items through the Alliance for a Healthier Generation's Smart Snack Calculator and keeping proof of measurement will ensure compliance.*

**Technical Assistance #5:** *FNS Instruction 113 requires the nondiscrimination "And Justice for All" poster to be prominently displayed in each participating school. It must be placed in a location that enables program participants to read the text of the poster without obstruction and must be 11" x 17".*

**Technical Assistance #6:** *Additional information regarding required [signage](#), including signage templates can be found on the DPI website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).*

**Technical Assistance #7:** *At the Bridge Program, OVS can be accomplished by allowing students to pre-order food from the planned menu. It was discussed that other options exist for accomplishing OVS requirements for 9-12 and one that is compliant and works for the SFA's practices and unique situation could be utilized.*

**Technical Assistance #8:** *The homeless liaison can provide a signed and dated list of homeless students in order to fulfill eligibility requirements.*

**Technical Assistance #9:** *Wisconsin School Day Milk Program - Ensure meal counts are taken at the time they are served. Meal counts did match but retraining should be done to ensure all staff understand the meal counting and claiming procedure for the milk program.*

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

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

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



*With School Nutrition Programs!*