

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

School Food Authority: Linn Jt. #6 School District

Agency Code: 64-3094

School(s) Reviewed: Reek Elementary

Review Date(s): January 25-26, 2018

Date of Exit Conference: January 26, 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 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, 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 Linn Jt. #6/Reek Elementary 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.

The DPI review team appreciates the eagerness of the staff at Linn Jt. #6/Reek Elementary for their willingness to make changes to meet school nutrition program regulations.

The DPI review team is confident that Linn Jt. #6 /Reek Elementary will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance (TA)

- Thirty-one eligibility determinations were reviewed with no errors identified.
- The basis of determining meal benefit eligibility is referenced in the most current [Eligibility Manual for School Meals](#) found on the DPI webpage for Free and Reduced Price information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>).
- [Free and Reduced Special Situations “In a Nutshell”](#) - this document summarizes situations found in the Free and Reduced Price process

Free and Reduced Price Meal Applications

- (TA) Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- 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, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.
- (TA) Categorically free meal eligibility is only allowed on a paper application from these programs: Food Share (the state program of the federal SNAP program), W-2 Cash Benefits (the state program for the federal TANF program) and Food Distribution Program on Indian Reservations (FDPIR). Badger Care, Forward Health, etc. are not valid programs for free meals.
- (TA) The application packet consists of the Letter to Parents/Frequently Asked Questions, the application form and its instructions.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate

representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus 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.

Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- (TA) Thank you for using the DPI prototype letters which are entered into Skyward, but each year you must check that the current non-discrimination statement is included in each letter.

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 that indicate 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.

Public Release

- (TA) All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

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.
- (TA) To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsin version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Direct Certification

- (TA) 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 and six months after the initial run ; it is helpful to run DC when you receive a new student and other times to pick up any newly eligible students.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- This [Direct Certification resource](#) indicates the eligibility codes used in Direct Certification

Transferring Students

- A child that transfers within the same LEA 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 LEAs 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 LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA 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, registration fee waiver, school fees, etc. The SFA uses a [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** The determining official did not indicate how the applications were approved and did not sign or date the application. The process is unclear, but that individual is no longer at this SFA.
Corrective Action Needed: Please submit a statement of the process the determining official will use for application approval.

- ❑ **Finding #2:** The [Letter to Parents/Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx) must be distributed to all households each school year after July 1 with the most current information.
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>)
Corrective Action Needed: Submit a statement of the district's process to provide the correct free and reduced price meal application packet to households for School Year 2018-19, including the Letter to Parents/Frequently Asked Questions.

- ❑ **Finding #3:** Staff who serve as the determining, confirming and verifying official are new to these tasks and must have some training in the process.
Corrective Action Needed: Please view webcasts found on the [DPI training webpage](#) to include:
 - [Filling out the Household Application for Free and Reduced Price School Meals](#)
 - [Getting Started in Free/Reduced Price Meal Eligibility](#)
 - [Verification](#)
 - Remember to count these trainings as continuing education hours for Professional Standards requirements.

- ❑ **Finding #4:** The [Public Release](#) must be submitted to a local newspaper, local grass root organizations (public libraries, food pantry, churches, etc.) and unemployment offices. Please share with major employers contemplating layoffs, as applicable.
Corrective Action Needed: Please submit a statement of the process to use for school year 2018-19 to include the appropriate places/agencies when distributing the Public Release.

Verification

Comments/Technical Assistance (TA)

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- DPI's [Verification](#) webpage contains many resources pertaining to the process (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Meal Counting and Claiming

Comments/Technical Assistance (TA)

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.

- When entering the claim it is necessary to use the edit check (Accuclaim) to calculate your reimbursable meals by site for claim submission.
- (TA) Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning). Special meals served to students in place of the reimbursable meals must be discontinued.
- The meal counting and claim for the Review Month was conducted perfectly.
- (TA) The Accuclaim report must always be used when submitting the monthly lunch claim. Be sure no transaction report is used.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #5:** A reimbursable meal must be served to students each day school is in session a full day. If special meals are provided, it takes away the opportunity for students to have access to a reimbursable meal. This practice affects the financial aspect of the school nutrition program as well as concerns for food safety and student safety in regards to food allergies. Apparently it was only a few times a year and provided by a school club; perhaps they could provide an afternoon snack in place, such as a yogurt parfait bar or trail mix bar. Be mindful of food allergies and food safety.

Corrective Action Needed: Please discontinue this special meal opportunity and provide a statement regarding the practice.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

Thank you to all staff of Linn Joint #6 for their time and cooperation during this Administrative Review. We appreciated the staff answering our questions and providing more information as this greatly expedited the review process. Thank you for your dedication to Child Nutrition Programs!

Technical Assistance:

Meal Pattern Responsibility with a Joint Agreement

- Although you are purchasing meals through a joint agreement, it is ultimately the School Food Authority's (SFA) responsibility to ensure all meal pattern requirements are met. Information on meal pattern requirements can be found on the [NSLP Meal Requirements and Nutrition Assessment](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) page of our website (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Crediting Using the Food Buying Guide

- Items that are not processed prior to purchase, such as raw meats, beans, eggs, fruits, vegetables, and milk, can be credited using the USDA [Food Buying Guide](#) (FBG). The FBG contains yield and crediting information for foods with standards of identity, such as those listed above. Foods that do not have standards of identity are not listed in the FBG and require further documentation.
- For more information on how to use the FBG, please see DPI SNT's [Food Buying Guide PDF](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/small-victories-food-buying-guide-presentation.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/small-victories-food-buying-guide-presentation.pdf).

Crediting Documentation

- Any processed product that is not listed in the USDA *Food Buying Guide* requires a current Child Nutrition (CN) label or a detailed manufacturer's Product Formulation Statement (PFS) to be credited toward the meal pattern.
 - A complete **CN label** includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that includes these four things. Simply cutting out the CN logo is not adequate documentation. 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.
 - A complete **PFS** must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).
- Current nutrition facts labels, CN labels, and/or PFS clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available on-site where meals are served, even if meals are prepared off-site. **Documentation can be stored as hard copies or electronically.** Crediting documentation should be updated at least twice per year and as new products are purchased or substituted. CN labels and PFS were not available on-site at Reek Elementary School.
 - This requirement is outlined in the joint agreement template, #12: *"The seller shall comply with all other requirements of their DPI agreement/application as it produces and makes available meals to the Purchaser, including providing the Purchaser with daily production/transport sheets indicating how menu items contribute to meal pattern requirements and supporting documentation for contribution."*
 - **Please work with Lake Geneva Middle School of Lake Geneva Joint #1 to obtain required documentation.**
- Remember to update records when new products are purchased or when product formulations change throughout the school year. More information about crediting documentation can be found on the [Meal Pattern Components](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

Standardized Recipes

- Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by the food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used.
- Currently, recipes in the Lake Geneva Middle School's kitchen are missing essential information needed in a standardized recipe. Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements. The missing information includes:
 - Steps for how to prepare the recipe
 - Cook time(s)
 - Temperature(s)
 - Recipe yield

- Pan size(s)
- Number of pans
- Weight or volume in each pan
- Equipment used
- Serving utensils to use
- Do not indicate if different serving sizes are for different age/grade groups
- A quantity recipe is being used as standardized recipes for the grilled cheese sandwich. This recipe will only be standardized once Lake Geneva Middle School has tried, tested, and adapted to it to their food service operation and products. This will be a continuous work in progress as they modify older recipes and update with current ingredients in stock.
- For the turkey and gravy recipe in particular, there are different variations of meat/meat alternate (M/MA) written on the recipe. For example, one variation shows 90 pounds of turkey roast and another shows 45 pounds of turkey roast and 45 pounds of diced chicken. While both of the above variations credit the same (2 M/MA for 700 servings), it was explained to Lake Geneva Middle School that it is important to create a different standardized recipe for each variation of the recipe used.

Transport Sheets

- Transport sheets are missing information that Reek Elementary must fill in on-site:
 - The number of meals actually served, currently there is just a total count of what was ordered.
 - Temperatures for all hot food and cold Time/Temperature Control for Safety (TCS) food at arrival to Reek Elementary and temperatures of all hot food and cold TCS food at meal service. These temperatures are recorded for only one hot food item daily on another sheet of paper instead of on the transport sheet.
 - The number of leftover meals.
 - Milk usage.
 - Milk is a required component as part of the National School Lunch Program. You must record daily usage by milk type (low-fat unflavored and fat-free flavored) on your production records.
- Transport sheets are missing information that Lake Geneva Middle School must fill in on-site:
 - The number of portions/quantity sent to Reek Elementary.
 - Temperatures for all hot food and cold TCS food when the hot and cold packs are loaded and the time the meals are loaded into the hot and cold packs and temperatures of all hot food and TCS food at meal service.
 - Currently, only hot food temperatures and the time the hot foods are loaded is recorded.
- Transport sheets also have inaccurate meal pattern requirements recorded on the template:
 - The meat/meat alternate (M/MA) requirement for K-8 is ≥ 9 ounce equivalent (oz eq).
 - The grain requirement for K-8 is ≥ 8 oz eq.
- While there is no required production record template, there are some examples, including transport sheets, that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements (“Must Haves and Nice to Haves” list) can also be found at that link. There are also [Instructions for How to Fill out Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).

Time/Temperature Control for Safety (TCS) Food

- The following foods are TCS foods:
 - Milk and dairy products
 - Shell eggs
 - Meat (beef, pork, and lamb)
 - Poultry
 - Fish
 - Shellfish and crustaceans
 - Baked potatoes
 - Heat-treated plant food, such as cooked rice, beans, and vegetables
 - Tofu or other soy protein
 - Sprouts and seed sprouts
 - Sliced melons
 - Cut tomatoes
 - Cut leafy greens
 - Untreated garlic-and-oil mixtures
 - Synthetic ingredients, such as textured soy protein in meat alternatives
- When using time as a public health control:
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold TCS food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°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 TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Signage

- Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](https://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). If you are interested in ordering signage from SNT, please visit the [Team Nutrition](https://dpi.wi.gov/team-nutrition) webpage and complete the Resource Order Form located at the bottom of the webpage. (<https://dpi.wi.gov/team-nutrition>).

Printed Monthly Menu

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

Findings and Corrective Action Needed:

Finding #P 1: Recipes in the Lake Geneva Middle School kitchen are missing essential information needed in a standardized recipe. Standardized recipes are needed for all menu items that have more than one ingredient.

Corrective Action Needed: Work with Lake Geneva Middle School of Lake Geneva Joint #1 to obtain the following standardized recipes and submit for corrective action.

- Submit updated recipes that are standardized for the following recipes:
 - Turkey and Gravy (Wednesday)
 - Hot Ham and Cheese (Thursday)
 - Grilled Cheese Sandwich (Friday)
- Submit standardized recipe for the following menu items:
 - Mashed potatoes (Wednesday)
 - Tomato soup (Friday)

Finding #P 2: Transport sheets are missing information the following information:

- The number of portions/quantity sent to Reek Elementary.
- Temperatures for all hot food and cold TCS food when the hot and cold packs are loaded and the time the meals are loaded into the hot and cold packs and temperatures of all hot food and TCS food at meal service.
- The number of meals actually served, currently there is just a total count of what was ordered.
- Temperatures for all hot food and cold Time/Temperature Control for Safety (TCS) food at arrival to Reek Elementary and temperatures of all hot food and cold TCS food at meal service. These temperatures are recorded for only one hot food item daily on another sheet of paper instead of on the transport sheet.
- The number of leftover meals.
- Milk usage.

Corrective Action Needed: Work with Lake Geneva Middle School of Lake Geneva Joint #1 to submit one week of completed transport sheets for lunch, which include the missing information listed above.

Finding #P 3: During the week of review, hummus and coleslaw were unable to be credited toward the meal pattern due to the manufacturers not having a PFS available to credit the specific products used. Hummus was unable to be credited on Tuesday and Friday. Coleslaw was unable to be credited on Thursday.

Corrective Action Needed: Work with Lake Geneva Middle School of Lake Geneva Joint #1 to submit a written statement for each menu item detailing the plan for how meal pattern will be met. This may include substitutions that will be made for these products or submitting a PFS if a new hummus and/or coleslaw product is planned to be offered.

Finding #P 4: There was a daily vegetable shortage at lunch during the week of review on Thursday because a PFS was not available to credit the coleslaw. This product was not able to be credited toward the meal pattern and the only other vegetable offered was ½ cup sweet potato fries. The daily vegetable requirement is ¾ cup.

Corrective Action Needed: Please refer to the corrective action under *finding #3*.

Please note that repeat violations of daily vegetable shortage during subsequent Administrative Reviews may result in fiscal action.

Finding #P 5: There were vegetable subgroup shortages during the week of review.

- Dark green: An 80/20 iceberg/romaine lettuce mix with red cabbage and carrots was offered on Monday and Wednesday's salad. The Food Buying Guide credits this product as other, not dark green. A PFS was not available upon request. This was considered a vegetable subgroup

shortage instead of a missing vegetable subgroup because the intention to serve the subgroup was evident.

- Beans/peas: Because a PFS was not available to credit the hummus on Tuesday and Friday, this product was not able to be credited toward the meal pattern. No other bean/pea was offered during the week of review. This was considered a vegetable subgroup shortage instead of a missing vegetable subgroup because the intention to serve the subgroup was evident.

Corrective Action Needed: Work with Lake Geneva Middle School of Lake Geneva Joint #1 to submit a written statement detailing the plan for how the dark green vegetable subgroup will be met. This may include what substitutions will be made for this product or changes that will be made to the menu during the week of review in order to meet the dark green vegetable subgroup ½ cup requirement. For beans/peas, please refer to corrective action under *finding #3*.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)

- The consultant addressed financial topics with the Business Manager including the agency's Child Nutrition Program report, Annual Financial Report, and reimbursement rates.
- The ending balance is below the 3 month limit of operating expenses, but getting close to the limit.

Annual Financial Report (AFR)

- (TA) All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- 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.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
 - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
 - Under "Purchases Services" report any time you pay someone for services provides such as equipment repair and health inspections.

- Under “Ala Carte”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
- When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<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. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- (TA) USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #6:** On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category. The Non-program Foods row must balance or exceed revenue in comparison with expenses in that category or that category must have a transfer from another fund into food service Fund 50.
Corrective Action Needed: Please resubmit your 16-17 Annual Financial Report with revenues and expenses broken out by program and category. To do this, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update.
- ❑ **Finding #7:** USDA guidance listed above requires an Unpaid Meal Charge policy for each SFA. No policy was found on the website, student handbook or onsite.
Corrective Action Needed: Please submit a statement of the timeline to complete a policy in reference to the district’s Unpaid Meal Charge policy.

Paid Lunch Equity (PLE)

Comments/Technical Assistance (TA)

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Great job running this tool! The SFA's current weighted average for 2017-18 SY tool is \$2.83. Plan to raise prices again for school year 2018-19 at least 10 cents.
- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the PLE 'In a Nutshell' for more information on the PLE tool.
- Refer to the most recent memo from DPI.
- Refer to the most recent guidance memo from USDA.
- Step by step instructions to completing the PLE tool can be found on our financial website under Paid Lunch Equity.

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)

- Nonprogram foods include Adult Meals and Extra Milk (for cold lunch or milk break).
- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are exempt from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).
- (TA) 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.

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals per minimum pricing guidelines in Food Nutrition Services Instruction 782-5, using the [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

Indirect Costs

Comments/Technical Assistance (TA)

- In Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance (TA)

Nondiscrimination Statement

- When including the [non-discrimination statement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc) 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 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc>). 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.

And Justice for All Poster

- “And Justice for All” poster was posted in public view where the program is offered.

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.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form was completed by the required October 31st date. Great work!

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. 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>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- If an individual states that they wish to file a civil rights complaint regarding the school nutrition programs, the SFA must provide them with the information necessary to do so. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- All verbal or written civil rights complaints 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 that this is included in the district procedures to ensure compliance.

Findings and Corrective Action Needed: Civil Rights

- **Finding #8:** The correct full nondiscrimination statement must be included on all letters to the households regarding notification of meal benefits and verification. The shortened statement is used on low balance notices sent to households correctly.
Corrective Action Required: Please submit a copy of the Direct Certification approval, Notice of Approval/Denial, and Notice of Verification letters with the correct full nondiscrimination statement.

- **Finding #9:** School nutrition staff have not completed the required [civil rights training](#) for the current school year. This includes the business manager, determining official, verifying and confirming official and lunch server.
Corrective Action Needed: Provide a statement of the plan to complete this task and the method to document the training.

Local Wellness Policy (LWP)

Comments/Technical Assistance (TA)

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.

Content of the Wellness Policy

At a minimum the wellness policy must include:

- 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.
- Food and beverage marketing must be consistent with Smart Snack guidelines.
- 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 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](#) 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 (LWP)

- **Finding #10:** The SFA's LWP meets some but not all requirements as stipulated above. The district needs to assess the policy to include language for school meals meeting nutrition standards established under the Healthy, Hunger-free Kids Act of 2010, foods sold outside of the school meal programs, food and beverage marketing, a defined goal for nutrition promotion with evidence based strategies like Smarter Lunchroom tools, and a clear way to inform the public about the content of and implementation of the policy.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule as stated above.

Smart Snacks

- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- At the time of the on-site review there were no competitive foods or beverages sold at Reek Elementary. 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. Non-food fundraisers do not need to be tracked. You can find fundraiser tracking tools on our [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the "Smart Snacks" regulation that became effective July 1, 2014. This includes fundraisers, unless it is an exempt fundraiser.
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Professional Standards: New Food Service Director Hiring Requirements

Comments/Technical Assistance (TA)

- 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.

- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management. If the food service director was in place before July 1, 2015, they are grandfathered in for the Professional Standards hiring requirements and no further hiring documentation or food safety documentation is required.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Newly hired directors must also complete at least 8 hours of food safety training within the past 5 years or the first 30 days of hire. Resources and food safety training providers are found on the [DPI Food Safety page](https://dpi.wi.gov/school-nutrition/food-safety) under trainings (<https://dpi.wi.gov/school-nutrition/food-safety>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A [template tracking](#) tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

Directors: 12 hours

Part Time Staff (under 20 hours per week): 4 hours

If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action: Professional Standards

- **Finding #11:** Staff have not completed the required training hours for the current school year and were unable to provide a training plan.
Corrective Action Needed: Provide a training plan for meeting the required training hours for the determining official, confirming official, verifying official, lunch server and office staff.
- **Finding #12:** Training is not being monitored on a tracking tool.
Corrective Action Needed: Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

Food Safety, Storage and Buy American Comments/Technical Assistance (TA)

[A Flash of Food Safety](#) 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](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year, including food safety inspection and a review of the site's Food Safety Plan.
- Each SFA is required to have someone at the school with required food safety training, per Wisconsin's Act 46.
- (TA) The most currently received food safety inspection report must be posted in public view.

Food Safety Plans

- The Food Safety Plan was available for review. Thank you.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff and any other people involved in the implementation of Child Nutrition Programs at all times.
 - Practices noted on day of review were that the delivery staff washed hands upon arrival and before taking food temperature. All TCS foods should have temperatures taken each day. After using the thermometer, it should be washed and sanitized with an alcohol wipe.
 - The meal server washed hands before setting up the line. Cooling equipment temperatures were taken and recorded.

Food Employee Reporting Agreements

- All food service employees have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf>). While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Buy American

- 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. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

Findings and Corrective Action Needed: Buy American

- ❑ **Finding #13:** The following products were identified in SFA's meals as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form:
 - Pineapple- Indonesia
 - Mandarin oranges- China
 - Cucumbers- Mexico

Reporting and Recordkeeping

Comments/Technical Assistance (TA)

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner. All documents related to the school nutrition programs must be retained for 3 years plus the current school year.
- 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.

Summer Food Service Program (SFSP) Outreach

- (TA) A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Linn Jt. #6 School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'Summer Meals' to 877-877 to find Summer sites
 - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

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).

