

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

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**School Food Authority: Delavan Christian School**

**Agency Code: 64-7041**

**School(s) Reviewed: Delavan Christian School**

**Review Date(s): 12/15/17**

**Date of Exit Conference: 12/15/17**

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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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.US Department of Agriculture.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.US Department of Agriculture.gov/healthierschoolday).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Delavan Christian School for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Commendations/Comments/Technical Assistance/Compliance Reminders

##### Free and Reduced Price Meal Applications

- The benefit's issuance document should have the date that the student became eligible for benefits not the day the application was submitted.

##### Findings and Corrective Action Needed: Certification and Benefit Issuance

- Finding #1:** The Benefit's Issuance document did not have the actual approval date of the application listed.

**Corrective Action Needed:** Please submit a statement of understanding that the BI list will contain the date the student was approved for benefits not the date the application was submitted.

#### Verification

##### Commendations/Comments/Technical Assistance/Compliance Reminders

- 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.
- Only applications on file as of October 1 are subject to the verification pool.
- 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.

##### Findings and Corrective Action Needed: Verification

- Finding #1:** The verification process was not completed by November 15.

**Corrective Action Needed:** Please complete the verification process and submit the Verification Collection Report when verification is complete. Information on the [verification process](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) can be found on our website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).

#### Meal Counting and Claiming

##### Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals must be offered to all students each full day school is in session.
- When counting student meals, an adult must complete the check-off sheets to assure accuracy of meal counting for claiming purposes.

## **Findings and Corrective Action Needed: Certification and Benefit Issuance**

- **Finding #1:** Delavan-Darien public school does not have school December 21 and will not be providing meals, but Delavan Christian does have school, so it will need to provide reimbursable meals to its students.  
**Corrective Action Needed:** Please submit the menu that is served to students on December 21, 2017.
- **Finding #2:** A student is at the beginning of line checking off students as they go through the line which constitutes a systemic unreliable point of service (POS).  
**Corrective Action Needed:** Please submit a plan as to how this point of service will be corrected with an adult completing the check-off sheets. It will be beneficial to move your point of service to the end of the line where the adult doing the check-off sheets will be able to assist the cook in determining if a reimbursable meal is on the student's tray. This adult will also need to be trained in offer versus serve to be able to determine if a reimbursable meal is taken. After a reliable POS has been established, please submit 30 operating days of clean counts. Recalculation will be applied to the meals served from September through December. Fiscal action will be assessed from this recalculation, but there is a \$600.00 disregard so a reclaim will not be necessary.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations/Technical Assistance/Compliance Reminders**

Thank you to all of the staff of Delavan Christian School for their warm welcome, timeliness, and cooperation during this Administrative Review (AR). Thank you to the school nutrition professionals for providing additional information prior to coming on-site. The school nutrition professionals were inquisitive, positive, interested in additional resources for implementing the National School Lunch Program (NSLP), and worked well with the students. We thank you for your time and dedication to your students and enjoyed our time at Delavan Christian School.

#### **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](#) page of our website ([dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning](http://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>).

#### **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 PFSs were not available on-site at Delavan Christian 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 Delavan-Darien School District 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>).

### **Production Records**

- Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Production records are intended to be useful tools to record information prior to production, during production, and following production. Currently, there is missing information on the production records being used including recipe and food item reference numbers, planned portion sizes, and actual usage of additional fruits, vegetables, salad bar, and condiments served. There are also sections of the production record that are not completely filled out.
- Be specific on production records about the identity, brand, and description of the items served. Fruit sizes (e.g. case count) should also be recorded. It is also helpful to include not just portion size, but also crediting on the production records.
- Planned portion sizes are required for every meal component. Even in self-service, such as the additional fruit, salad bar, and condiments, the menu planner must plan a specific portion size for what they intend for students to select. A copy of the production record requirements *“Must haves and Nice to haves” list* can also be found on the [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>).

### **Standardized Recipes**

- Standardized recipes are required for all menu items that have more than one ingredient. For example, the green beans are prepared with garlic powder, which requires a standardized recipe. Because Delavan Christian School is a joint receiving meals from another school district, Delavan Christian School should work with the Delavan-Darien School District to receive updated standardized recipes with all of the required information. For example, a standardized recipe for the walking tacos should be on-site that includes the portion size and scoop number to be used for serving

the taco meat, the portion size of the corn tortilla chips, and the portion sizes for extras such as shredded cheese, sour cream, lettuce, and salsa, even though these extras do not credit toward the reimbursable meal. Additionally, the crediting information for all of the walking tacos should be included on the standardized recipe or the production record. This will ensure Delavan Christian School knows how menu items credit towards the meal pattern.

- 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 the food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [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>). Recipes exist, but many are not accurately reflecting what is happening in the kitchen. Adjusting standardized recipes can change crediting, which may result in a daily and/or weekly shortage of a food component.

#### **Extras (Non-Creditable Food Items)**

- Extra, non-creditable items, such as cottage cheese, bacon bits, olives, pickles, croutons, and condiments, are offered in addition to the reimbursable meal. These foods are not being credited toward the meal pattern as it is after the point of service (POS). These extras must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra, non-creditable items is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extras are frequently served. These foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal.
- Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Condiment usage is not monitored nor are portion sizes communicated to students. Please monitor your school's condiment usage and communicate appropriate portion sizes to students. This can be done with signage, such as a photo, of what a serving size of ranch dressing looks like or putting out portion cups for students to use.
- The Weekly Nutrient Calculator can be used to analyze calories, saturated fat, and sodium values weighted over the week. When analyzing nutrients, the values must be weighted according to popularity (how the menu planner plans for each item to be selected). This tool can be found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>) under 'Menu Planning Tools.' The 5-day version should be used for your site.

#### **Salt**

- Currently, a salt shaker is available to students on the salad bar line. Salt shaker usage is not monitored nor are portion sizes communicated to students. Because Delavan Christian is a joint and receiving pre-planned meals, production records should be followed as they are. Salt is not listed on the production records and therefore has not been accounted for in the dietary specifications. It was noted that only a couple of students used the salt shaker, therefore, it is not deterring students from consuming components of the reimbursable meal. However, it is strongly discouraged to offer salt to students, as the sodium limits are set so that there is little room for additional sodium to be added after the rest of the meal is taken into account. Sodium-free spices or a spice station are great alternatives to salt.

#### **Second Entrées**

- When second portions of entrée items are offered and students are not charged la carte prices, the calories, saturated fat, and sodium of these portions must be included in the weekly averages for dietary specifications (calories, saturated fat, and sodium).

- Discontinue the practice of offering second entrées free of charge to students. This practice complicates production planning; increases food costs; is discriminatory if only offered to certain students and not all; and increases the likelihood meals exceed the dietary specifications. If students are still hungry, second entrées should not be given away but can be sold a la carte. Keep in mind that if sold a la carte, each menu item must meet Smart Snack Standards, which can be found on DPI’s [Smart Snacks In a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf).

**Portioning Utensils**

- Planned, controlled portion sizes are essential for compliance with meal pattern requirements and dietary specifications. Portion control teaches students good eating habits by demonstrating and providing appropriate portion sizes of foods. The salad bar offers food items, such as cottage cheese, shredded cheese, pickles, olives, croutons, and sour cream, in addition to the reimbursable meal. These food items should be portion controlled using appropriate utensils for their intended serving size, which should be recorded on the production record. Tongs are not appropriate portion control utensils. For example, cottage cheese should use the appropriate spoodle for the intended serving size the menu planner plans and accounts for in dietary specifications. To determine the appropriate serving utensil for shredded cheese, weigh out the intended serving size, for example 1 ounce, and find a spoodle in which this serving size fits best. Remember, a 1 ounce spoodle is a fluid ounce measure, which measures volume, and does not measure 1 ounce by weight.

**Fruit and Vegetable Crediting**

- According to the USDA [Food Buying Guide \(FBG\) for School Meal Programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs), one clementine or “Cutie” credits as 3/8 cup fruit. Therefore, if a student selects one clementine without selecting other fruits or vegetables, this is only 3/8 cup and does not meet the 1/2 cup requirement of fruit and/or vegetable under Offer Versus Serve (OVS). Two clementines need to be selected in order to obtain a full 1/2 cup portion. Consider including signage on the service line indicating that two clementines credit as 1/2 cup fruit.
- Portion sizes served must be full, level scoops in standardized measuring utensils. For example, grapes at the school are not portioned, but left on the stem and cut into small clusters, which may not credit as a full 1/2 cup fruit. Some fruits, like grapes, and vegetables may be difficult to measure using a spoodle or other measuring utensil. In these cases, it is helpful to use the FBG to determine the weight of 1/2 cup. Below is an example using grapes:
  - The FBG indicates 1 pound of grapes, with stems, provides 10.5 - 1/4 cups of fruit. Divide 10.5 by 4, to get the total number of cups, so 1 pound (or 16 oz) = 2.625 cups. From this, the weight of 1 serving can be determined. A 1/2 cup serving will be used for this example.

$$\begin{array}{r}
 16 \text{ oz} \\
 \hline
 2.625 \text{ cups}
 \end{array}
 =
 \begin{array}{r}
 X \text{ oz} \\
 \hline
 .5 \text{ cup}
 \end{array}$$

Cross multiply, so 16 oz x 0.5 cups = 8, then divide by 2.625 = 3.05 oz. This means that 1/2 cup of grapes with stems weighs 3.05 oz.

- Please use the FBG to credit grapes, strawberries, and other fruit and vegetables by weight that cannot accurately be credited by using a leveled scoop. Once the fruits and vegetables are weighed out, place them in a portion cup that can fit the whole portion of the fruit or vegetable.

**Offer Versus Serve (OVS)**

- Food service staff were unclear about the Offer versus Serve (OVS) requirements for lunch. Although all students observed at lunch took a reimbursable meal, it is important for staff to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](#) is available on our website ([dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf)). DPI SNT's [Training](#) webpage also has a webcast available, which outlines the OVS requirements for lunch (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).
- Under OVS, students must have three full components, which can be a grain, meat/meat alternate, fruit, vegetable, or milk, with one of the required components being a ½ cup fruit and/or vegetable in order for the meal to be reimbursable.
  - For example, if a student has the planned portion of chicken nuggets and a ½ cup portion of apple slices, this is a reimbursable meal. The chicken nuggets count as two components, grain and meat/meat alternate, and the student has selected the required ½ cup portion of fruit and/or vegetable.

### Training

- Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [Training](#) webpage for current and upcoming opportunities ([dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training)). Members on the School Nutrition Team are also available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website ([dpi.wi.gov/school-nutrition/directory](http://dpi.wi.gov/school-nutrition/directory)).
- DPI conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. Courses such as Meal Pattern: The Whole Enchilada and Offer versus Serve are recommended for lead workers and menu planners from each site. Information, including dates and locations, will be posted on the DPI training webpage.

### Findings and Corrective Action Needed: Meal Pattern

- ❑ **Finding #1:** Production records were incomplete and missing information, including recipe and food item reference numbers and planned portion sizes and actual usage of additional fruits, vegetables, salad bar, and condiments served.  
**Corrective Action Needed:** Submit one week of complete production records for lunch, which include the information listed above.
- ❑ **Finding #2:** Offer versus Serve training should be completed with food service staff and point of service staff at Delavan Christian School to ensure that reimbursable meals are selected. There is an [Offer versus Serve](#) webcast on DPI's website that can be used for training (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).  
**Corrective Action Needed:** Please submit a signed training roster confirming that staff at Delavan Christian School completed Offer versus Serve training.
- ❑ **Finding #3:** At the beginning of meal service, ½ cup spoodles were not on the service line to serve the planned ½ cup portions for vegetables. Instead, regular spoons and slotted spoons were on the line. Before meal service could continue, the cook was asked to use ½ cup spoodles for service. The only spoodles available were ¼ cup spoodles. Two ¼ cup spoodles of vegetables were served to students. Proper portion size utensils should be used and are very important. This ensures students are served the planned amount to meet meal pattern requirements. For more information and training on the importance of portion control, please view the [What's the Scoop on Portion Control?](#) webcast (<https://dpi.wi.gov/school-nutrition/training/webcasts#pc>).  
**Corrective Action Needed:** Please submit a written statement explaining how planned, proper portion sizes will be served to students using appropriate serving utensils.

- ❑ **Finding #4:** Documentation provided for the week of review demonstrated a weekly grain shortage due to the required minimum amount of grains, 8.00 ounce equivalents (oz. eq.), not being met. The minimum grains for each day for the week of review are as follows:
- Monday- Sausage pizza and hamburger 2.00 oz. eq.
  - Tuesday- Soft shell tacos 1.25 oz. eq.
  - Wednesday- Chicken nuggets 1.00 oz. eq.
  - Thursday- Mini corn dogs and grilled cheese 2.00 oz. eq.
  - Friday- PBJ & yogurt 1.00 oz. eq.

For additional information on meal pattern requirements, please visit the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

**Corrective Action Needed:** Please submit a written statement explaining how you will meet the 8.00 ounce equivalent grain requirement for the week of review and your plan for ensuring the minimum grain requirement is met for future service weeks. Please include respective serving sizes and labels, if applicable.

- ❑ **Finding #5:** Documentation provided for the week of review demonstrated a red/orange vegetable subgroup shortage. The red/orange vegetable subgroup weekly requirement is  $\frac{3}{4}$  cup and only  $\frac{1}{2}$  cup of carrots were served for the whole week on Wednesday, November 8<sup>th</sup>. More information regarding the weekly vegetable subgroup requirements can be found on the [Menu Planning](http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning) webpage (http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning). There is also a [Vegetable Subgroups Chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) that categorizes vegetables by their subgroup. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf).

**Corrective Action Needed:** Please submit a written statement explaining how you will meet the  $\frac{3}{4}$  cup red/orange vegetable subgroup requirement for the week of review and your plan for ensuring the  $\frac{3}{4}$  cup red/orange vegetable subgroup requirement is met for future service weeks. Please include respective serving sizes.

- ❑ **Finding #6:** For the week of review, production records did not have an “amount prepared” filled out for planned menu items. When asked, the cook explained that peas were not offered on Thursday, November 9<sup>th</sup> and California vegetables were not offered on Friday, November 10<sup>th</sup>. The cook explained that students normally do not prefer these items over other menu items for the day, therefore, they were not prepared or offered. Please note that changes cannot be made to the planned menu as changes may result in insufficient daily and weekly quantities. These menu changes did in fact result in insufficient daily quantities of vegetables on Thursday and Friday during the week of review. The NSLP K-8 meal pattern daily vegetable requirement is  $\frac{3}{4}$  cup. On these two days, only  $\frac{1}{2}$  cup of vegetable was offered. These vegetables respective subgroups were still met. For additional information on meal pattern requirements, please visit the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

**Corrective Action Needed:** Please submit a written statement indicating that changes to the planned menu will not be made when all planned menu components are readily available.

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

#### Commendations/Comments/Technical Assistance/Compliance Reminders



### **Annual Financial Report (AFR):**

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and 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 our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.
- 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.
- 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 serving cart, etc., should be reported under “Other”.
  - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “Ala Carte”, you should be reporting 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, you want to 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**

- 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

### **Joint Agreements**

- Invoices for SFAs in joint agreements with another SFA should reflect the credit received for their commodity entitlement value. This may be done by decreasing the per meal cost by the per meal commodity value or credit to the monthly invoice.

### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

- ❑ **Finding #1:** On the Annual Financial Report all revenues were not recorded causing the ending fund balance to be in the negative.

**Corrective Action Needed:** Please resubmit your annual financial report with the correct revenues and also include the credit from Delavan-Darien public school.

- ❑ **Finding #2:** On the Annual Financial Report, all revenues and expenses were put into NSLP, no revenues or expenses were recorded in nonprogram foods.

**Corrective Action Needed:** Please provide a statement of understanding that the 17-18 Annual Financial Report will have nonprogram food revenues and expenses broken out from National School Lunch.

## Revenue from Nonprogram Foods

### Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs 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.

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

### Commendations/Comments/Technical Assistance/Compliance Reminders

#### Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complain Form](#) for assistance in filing these complaints ([https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)).

#### 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. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Medical statements must include
  - A description of the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, and

- An explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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>).
- Food Service should have copies of all medical statements for students within their school to provide correct meal substitutions.

## **Local Wellness Policy**

### **Commendations/Comments/Technical Assistance/Compliance Reminders**

- Excellent Wellness Policy! Thank you for your attention to detail!

## **Smart Snacks in Schools**

### **Technical Assistance/Compliance Reminders**

- 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- At the time of the on-site review, Delavan Christian School was not selling and did not sell competitive foods or beverages. 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 and non-exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage under Tracking Tools (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- 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.

## **Professional Standards: New Food Service Director Hiring Requirements**

### **Commendations/Comments/Technical Assistance/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.
- 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.

- The [hiring standards for SFA directors](#) are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- 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, 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](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

#### Annual Training Requirements for All Staff

Directors: 12 hours

Other Staff (20 hours or more per week): 6 hours

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

#### Findings and Corrective Action: Professional Standards

- Finding #1:** The new food service director did not meet new director hiring standards.  
**Corrective Action Needed:** Please apply for an exception and complete the designated training plan.

#### **Food Safety, Storage and Buy American**

#### Commendations/Comments/Technical Assistance/Compliance Reminders

[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](http://www.fns.usda.gov/ofs/food-safety-flashes)). The [Office of Food Safety](#) website ([www.fns.usda.gov/ofs/food-safety](http://www.fns.usda.gov/ofs/food-safety)) includes food safety resources.

#### **Employee Reporting Agreements**

- All food service employees must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).

**Food Safety Plans** Most recent food safety inspection must be posted in a publically visible location.

- 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 food service staff. 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](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (https://dpi.wi.gov/school-nutrition/food-safety)

- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs.

#### **Time/Temperature Control for Safety (TCS) Food**

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

#### **Time as Public Health Control**

- 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 time/temperature control for safety (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.

#### **Findings and Corrective Action: Food Safety**

- Finding #1:** Most recent Food Safety inspection was not posted in a publically visible location.  
**Corrective Action Needed:** Please move the food safety inspection outside of the doors into the cafeteria and take a picture of its location and submit as corrective action.
- Finding #2:** The SFA does not have a Food Safety Plan.  
**Corrective Action Needed:** Please develop a site-specific Food Safety Plan and submit it in attachment form. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (https://dpi.wi.gov/school-nutrition/food-safety).

## 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.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
  - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
  - If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted within an email.
  - What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If 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 RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
  - Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
  - Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. [Sample written procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

## Findings and Corrective Action Needed: Buy American

- **Finding #1:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List, or SFA equivalent form, or did not have proper labeling to identify the country of origin:
  - Frozen Broccoli – Guatemala
  - Frozen California Blend - Mexico

**Corrective Action:** The identified noncompliant food item(s) qualify to be on the non-compliant product list, but the SFA did not have a noncompliant list/process in place for tracking. The SFA began using a Noncompliant Product List for tracking nondomestic products today. Provide the completed list as corrective action. A [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).
- **Label does not identify country of origin:**  
In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the TA notes above for sample certification language. This will be treated as TA for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

## Summer Food Service Program (SFSP) Outreach

### Commendations/Comments/Technical Assistance/Compliance Reminders

#### Summer Meals

- 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 Delavan Christian School, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. Delavan-Darien public school offers summer meals.
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

#### Findings and Corrective Action: SBP and SFSP Outreach

- **Finding #1:** Summer food service outreach was not provided to students.  
**Corrective Action Needed:** Please provide a statement that you will notify students of the ability to receive free summer meals at Delavan-Darien public school.

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 your students' success.

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