

WISCONSIN DEPARTMENT OF
PUBLIC INSTRUCTION

SFA Name: Hartland Lakeside Schools #672460
 Administrative Review Conducted on: 3/14/2017
 Sites Selected for Review: North Shore Middle School
South Elementary

Date Corrective Action Plan was provided to SFA: 4/14/2017

Commendations & Suggestions

Outstanding job meeting all of the requirements for breakfast. All daily and weekly meal component and food quantity requirements were met for the week of menu review, for breakfast.

Documents were very well organized. With few exceptions, records were complete and included the required documentation. Suggestions and recommendations were accepted well with plans for implementation.

The district should be commended for the very colorful healthy choices and appealing menus that are served. The students are offered many choices to satisfy their appetite.

All employees were very professional and the cafeteria line staff had pleasant interaction with the students.

The FSD and the District Data Manager were very cooperative and initiated some of the corrections on the same day of the review.

The kitchens and cafeterias were very clean and organized and the serving areas had great examples of posters.

The dining and serving areas were attractive and conducive to students eating well. Great professional signage was posted in the serving area that made an attractive dining out atmosphere. Mascot Murals were displayed in a spirited fashion. Amazing art work and architectural pieces were displayed throughout the cafeteria and school.

It was suggested to complete the Verification Training Webinar prior to October 31. This will aid in answering questions prior to taking on the task of Verification.

It was suggested that you take advantage of understanding your software and all it can do for you when doing your end of day and edit checks.

Use the Food Buying Guide from USDA to accurately check your menus for meeting and understanding all the required quantities. See also Exhibit A for Grains/Breads.

Other areas of Technical Assistance (NOT requiring Corrective Action)

Menu Review-technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.
The SFA did not complete the verification training. During the review, the requirement for all staff to complete verification training was discussed with the SFA.
Storage violations were observed on-site. The SFA had items removed from a case that was not dated as received. During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated once the case is broken. The date must be transferred from the case to the individual item.
Technical Assistance was provided on use of the USDA Food Buying Guide. When questioning whether the quantity of the component meets the USDA requirement, handy guides and calculators are on the USDA website for your convenience. A school must offer the food components and quantities required in the school meal patterns established for K-12 meals daily.

Due Date for Corrective Action Plan:

5/12/2017

The following pages address the findings that were identified during your Administrative Review.
 For each finding you will be presented with the following:

The finding, and details specific to the SFA regarding the finding	A summary of the regulation / requirement
The Code of Federal Regulations citation number or alternate resource citation	Suggested guidance for the SFA in order to achieve compliance
	SFA area for reply to state how, when and by whom corrections will be made

Please provide a detailed response to each finding in the spaces provided.

Finding #1
410. For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent grain.
Technical Assistance Provided
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

Regulation / Citation and Summary
210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-5: minimum of 8 oz. equivalent of grains per week.
SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.
SFA Response

Finding #2
410. For the week of menu review, the 6-8 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent grain.
Technical Assistance Provided
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/
Regulation / Citation and Summary
210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities

required in the lunch meal pattern established: 6-8: minimum of 8 oz. equivalent of grains per week.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #3

The SFA annualized income when it should have been determined at its stated frequency.

Technical Assistance Provided

During the review, making determinations based on the stated frequency was discussed with the SFA. When determining eligibility, the SFA may not annualize income unless income sources are listed at different frequencies. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12.

Regulation / Citation and Summary

245.6(c)(4) Calculating income. The local educational agency must use the income information provided by the household on the application to calculate the household's total current income. Eligibility Manual, Chapter 3: If there is only one source of income, or if all sources are received in the same frequency, the LEA totals all sources and compares the total to the IEGs.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for determining applications, the SFA must provide written assurance that the SFA will determine applications based on the frequency of pay provided on the application when only one frequency is listed and that the SFA will use the correct conversions factors when multiple pay frequencies are provided to determine the annual income.

SFA Response

Finding #4

Resource Management Comprehensive Review – NonProgram Foods

Prior to the review, the SFA had not determined compliance with nonprogram food requirements.

Technical Assistance Provided

During the review the SFA completed the tool as required, and it showed the SFA was in compliance. The NonProgram Food Revenue Tool (or DPI's NonProgram Price Calculator Tool) should be completed every year. If the tool shows additional nonprogram revenue is needed to comply, nonprogram food prices should be increased. A copy of the tool was sent to the SFA, and can also be found on the DPI website.

Regulation / Citation and Summary

7 CFR 210.14 (f) Revenue from non-program foods. Beginning July 1, 2011, school food authorities shall ensure that the revenue generated from the sale of non-program foods complies with the requirements in this paragraph.

(1) Definition of non-program foods. For the purposes of this paragraph, non-program foods are those foods and beverages; (i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account.

(2) Revenue from non-program foods. The proportion of total revenue from the sale of non-program foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining non-program foods (ii) The total costs associated with obtaining program and non-program foods from the account.

SFA Suggested Guidance for Compliance

As the corrective action response, please explain the process that will be put into place to ensure that the USDA Nonprogram Food Revenue Tool or the DPI NonProgram Price Calculator Tool is completed each year. This should include a timeframe for when the tool will be completed, the name by position of the person responsible for completing the tool, and the steps that will be taken if the tool shows you are out of compliance. Additionally, submit a completed copy of the tool. If the tool shows you are out of compliance, include a plan to increase nonprogram food prices.

SFA Response

Finding #5
<p>Resource Management Comprehensive Review – Adult Meals The SFA has not sufficiently priced their adult lunches. Additionally, the SFA misreported adult meal prices to the State Agency.</p>
Technical Assistance Provided
<p>Adult meals must be priced at least at the student price plus per-meal reimbursements and the value of commodities received. In the review year, the SFA priced adult lunches at \$3.30, but should have charged at least \$3.88 (\$3.25 student price + \$.35 federal reimbursement + \$.2375 value of commodities + \$.0469 state reimbursement). This year, the SFA should have charged at least \$3.93, but only charged \$3.30. Additionally, the SFA reported an adult meal price of \$3.90 to the State Agency. The applications should be revised to reflect the actual adult meal price. The DPI Adult Meal Memo was sent to the SFA in an email. This memo, along with updated reimbursement rates and the value of commodities can be found on DPI's Financial Management website: https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial</p>
Regulation / Citation and Summary
<p>FNS Instruction 782-5: Pricing of Adult Meals in the National School Lunch And School Breakfast Programs "Breakfasts and lunches served to teachers, administrators, custodians and other adults must be priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) is sufficient to cover the overall cost of the lunch. Including the value of any USDA entitlement and bonus donated foods used to prepare the meal. If cost data are not available, the minimum adult payment should reflect the price charged to Students paying the school's designated full price, plus the current value of Federal cash and donated food assistance (entitlement and bonus) for full price meals. In nonpricing programs, the adult charge should be at least the amount of reimbursement received for a free lunch under Section 4 and 11 of the National School Lunch Act, plus the per-meal value of both entitlement and bonus donated foods, or for breakfasts, the rate established for free meals under Section 4 of the Child Nutrition Act, plus the value of bonus commodities."</p>
SFA Suggested Guidance for Compliance

As the corrective action response, provide documentation showing that adult meal prices have increased as required, or show how the SFA is using non-federal funds to make up for the adult meal price deficiency. Include documentation showing the SNP applications for SY 15-16 & SY 16-17 have been revised to reflect the actual price charged to adults. Explain the process that will be put into place to ensure that an adult meal pricing policy is established and reviewed annually. This pricing policy should establish guidelines for determining the cost of adult meals and document any sources of revenue designated specifically for the support of adult meals if the adults will be undercharged.

SFA Response

