

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Lake Country School District **Agency Code:** 67-3862

School(s) Reviewed: Lake Country School

Review Date(s): 11/29/16-11/30/16

Date of Exit Conference: 11/30/16

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 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 webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Special thanks to the Food Service Director and the Business Manager for sending in the off-site assessment tool and resource management documentation in advance. Thank you for putting together the binder of all the required documents. Having those documents available ahead of time and immediately on-site allowed us to spend more time during the on-site review providing technical assistance. The Food Service Director and her staff were wonderful to work with. The Food Service Director retrieved any documentation we needed while we were there.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

The October claim was reviewed. Everything was well organized and well done. The Food Service Director did a great job with the edit check and submits the claims in a timely manner.

Comments/Technical Assistance/Compliance Reminders

1. Technical assistance was provided regarding applications that were missing income frequency information or recorded income in column A and the seasonal work column. If the information provided on an application is not clear, be sure to follow up with the household for clarification to be able to determine the application.
2. Remember to sign and date when applications are determined. The date that applications are determined by the Determining Official is when the start date of eligibility is. Applications must be approved and a letter of notification sent to the households within 10 operating days of receipt of the application.

Findings and Corrective Action Needed

Finding #1: One student was receiving free benefits after the carryover date. This student should have been changed to paid in October at the end of the first 30 operating days of the school year.

Corrective Action Needed: Notify the household, whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the student's eligibility in Skyward, 10 calendar days from the date the notification letter is sent out. A letter was sent out on 11/29/16. No further action required.

Finding #2: The application chosen for Verification was verified incorrectly. The net income was used instead of the gross income. Therefore, the student is not eligible for reduced meals instead of free.

Corrective Action Needed: Notify the household, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the student's eligibility in Skyward, 10 calendar days from the date the notification letter is sent out. A letter was sent out on 11/29/16. No further action required.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director for sending me a complete packet of needed information before the assigned due date. This greatly expedited the meal pattern review portion of your Administrative Review.

You consistently provided the required amounts of fruit and vegetable and offered produce in a unique and appealing way, such as fall squash, lemon zest broccoli, bistro spinach salad, and cucumber dill salad. This is a Smarter Lunchroom technique that has been shown to increase participation in the program and consumption of fruits and vegetables. During the day of review, you paired bright red cherry tomatoes and cucumber slices in a boat which was visually appealing.

Through answering a series of questions based on the National School Lunch Program at Lake Country School, it was determined that this program is at low-risk for noncompliance with the meal pattern. This means it was not required to perform a detailed Nutrient Analysis of one week of meals. You have a clear understanding of the regulations and this school is fortunate to have you running this essential program.

Also, thank you for answering my questions regarding Smart Snacks and fundraisers.

Comments/Technical Assistance/Compliance Reminders

When comparing the production records and documentation from the week of review, there were discrepancies noted in how menu items credited. The Food Service Director and I discussed these via email before the on-site review as well as in person and the Food Service Director was refreshed on how to credit grain and meat/meat alternates towards the National School Lunch Program.

In our conversations, the Food Service Director was also reminded to confirm there is no trans fat present in the food items she is ordering. It is important to look at trans fat, not just total fat on the Nutrition Facts Label.

Per the October and November menu, desserts are offered 1-2 times per week. Desserts included fruit snacks, Oreo cookies and animal crackers. Keep in mind that non-whole grain-rich desserts do not credit toward any component and merely add calories to the weekly allotment of 600-650 calories per lunch. This also applies to desserts such as fruit snacks. I recommended further limiting these types of desserts and offering alternatives such as the whole grain-rich animal crackers unless it is shown to increase overall participation.

The recommended range of meat/meat alternate servings is between 9-10 oz eq for the K-8 age group. The week of lunches reviewed showed that students were offered a potential 13.25 oz eq of meat/meat alternate. While there are no mandated maximums of meat to serve in the school meals programs, it is often indicative that the calorie allotment is being exceeded. Please consider limiting the amount of meat/meat alternate included in some meals. For example, the Chef Salad contains ham, turkey, hard-boiled egg, and 1.5 ounces of cheese. Limiting the salad to contain one meat and perhaps decreasing the serving of cheese will make a noticeable difference.

Findings and Corrective Action Needed

There are no Corrective Action items due.

3. RESOURCE MANAGEMENT

Commendations

1. Paid Lunch Equity Tool was well done.
2. Resource Management Risk Assessment Tool was completed with 2 flags. A comprehensive review of the non-profit school food service account and non-program foods was required.

Comments/Technical Assistance/Compliance Reminders

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, 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> . For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

4. GENERAL PROGRAM COMPLIANCE

Commendations

1. Food Safety plan, temperature logs all looked great.
2. The most recent food safety inspection is posted on a bulletin board in the hallway of the school.
3. The school is in compliance with the smart snacks regulation and doing a good job documenting all foods sold to students outside of the school nutrition programs.
4. Great job keeping all of your records and documentation regarding the National School Lunch Program.

Comments/Technical Assistance/Compliance Reminders

1. For next year, attempt to publish the Public Release for free and reduced price meals in 3 local media and/or grassroots organizations that reach minority or under-represented groups. SFAs are required to send the public release to local media and community grassroots organization but are not required to pay to have it published. File a copy of materials sent and list of who sent to at the SFA. Some examples of grassroots organizations are the YMCA, Boys and Girls Club, libraries, laundromats, food pantries, unemployment offices, etc.

2. Be sure to complete the Civil Rights Compliance Self Evaluation form (PI – 1441) by October 31 each year.
3. Professional standards training hours need to be tracked using a notebook or excel spreadsheet. The most important contents to include are the names of staff, how long the training attended was, what the topic of training was, and who provided the training.
4. Free training webinars can be found here:
<http://professionalstandards.nal.usda.gov/content/professional-standards-information>
5. Professional Standards tracking tool: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>
6. Professional Standards website: <http://dpi.wi.gov/school-nutrition/training/professional-standards>
7. 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 of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

The Wellness Policy should include:

- a. Specific measurable goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
- b. Nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
- c. At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process.
- d. Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies on school website, social media, newspaper, or newsletters.
- e. Document public involvement, public updates, policy leadership, and evaluation plan.
- f. SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy.
- g. 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. Some methods of notification include mailing flyers, newsletters, emails, website postings, and newspaper articles.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <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 at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

5. OTHER FEDERAL PROGRAMS REVIEWS

Comments/Technical Assistance/Compliance Reminders

This is a reminder that the regulations require that the SFA inform eligible families before the end of the school year of availability and location(s) of any Summer Food Service Programs located in the geographic area of the SFA. Information on this can be found on our website at <http://dpi.wi.gov/community-nutrition/sfsp>. There is a link at the bottom of the page that shows a map of all the places in the area offering the Summer Food Service Program. Families can also call 211 to get accurate dates and time of locations operating the Summer Food Service Program.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. 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 webpage dpi.wi.gov/statesupt/agenda-2017.

