

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

School Food Authority: Oshkosh Area School District Agency Code: 70-4179

School(s) Reviewed: Smith Elementary, Oshkosh West High, Webster Stanley Elementary and Webster Stanley Middle along with Second Chance

Review Date(s): December 10-14, 2018

Date of Exit Conference: December 14, 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:

- Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage, under Upcoming Trainings (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts) webpage (<https://dpi.wi.gov/school-nutrition/training/webcasts>).
- 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](https://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 Oshkosh Area School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff at Oshkosh Area School District (OASD) for their willingness to identify and make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu variety, customer service, local wellness and Smart Snacks. We were impressed during meal service that students had so many choices to select from and options to make a reimbursable meal, even at the elementary level. The school nutrition kitchen and serving staff work efficiently and were friendly and caring to the customers.

School nutrition staff work well to provide quality meals and excellent customer service. The DPI review team is confident that OASD will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

CERTIFICATION AND BENEFIT ISSUANCE

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Five hundred and sixty eligibility determinations were reviewed with zero errors identified.
- Applications are 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.
- Nice work was done manually and through Infinite Campus when determining applications, looking at the income frequency as compared to the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1819.pdf) and only converting to annual when there were multiple income frequencies (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1819.pdf>).
- Thank you for collecting written consent from the parent or guardian to use the information provided on the application or through direct certification for Instructional Fees or Athletic Fees. Consent must be obtained each school year.

Free and Reduced Price Meal Applications

- 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.
- 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.

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.

Income Eligibility Guidelines

- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-app-parent-letter-faq-1819.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-app-parent-letter-faq-1819.docx>).

Household Size Box

- (TA) 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.

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.
- Please check that all documents and letters contain the current non-discrimination statement in its entirety and in the same size font as the rest of the document.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, runaway or Head Start, 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.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals and free milk 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.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong. This SFA provides the application packet in English, Spanish, Hmong, Arabic and Swahili or uses the link to USDA's list of other language resources.
- 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>).
- 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

- 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.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running the Direct Certification matches in the required time frames; the SFA may wish to complete a DC run when you receive a new student and more often to pick up any newly eligible students.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- 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

- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

VERIFICATION

Commendations/Comments/Technical Assistance (TA)/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.
- 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

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance. The claims for the Review Month matched the Infinite Campus general summary sheets for each site. The programs claimed were National School Lunch, School Breakfast and Severe Need Breakfast, Special Milk Program and Wisconsin School Day Milk Program.
- (TA) When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for lunch and breakfast claim submission.
- 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>).
- Please note that SFAs may claim visiting students in the paid category or the individual’s category with documentation, unless they are from a CEP school.
- 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.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Thank you to all staff at Oshkosh School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Nutrition Database Coordinator (NDC) for sending documentation prior to the onsite visit as this greatly expedited the AR. The NDC has been a pleasure to work with, always helpful and receptive to suggestions. The food service department is doing a nice job offering a variety of fruit and vegetables, both fresh, canned, and dried, to students daily as well as multiple entree options. Everyone was welcoming, friendly, easy to work with, and worked well with each other.

Oshkosh West High School

- The school nutrition professionals did a wonderful job preparing a large number of meals, many of which were shipped out to other schools within the district. It was truly amazing that they could do this on top of preparing over fifteen entree options at lunch for the high school level! There were many options for the high school including homemade soup for lunch and homemade, whole grain-rich apple muffins for breakfast.
- Great Offer versus Serve (OVS) understanding among the staff at Oshkosh West High School. The Point of Service (POS) staff could easily and quickly differentiate reimbursable meals from a la carte options.

Webster Stanley Middle School

- During the first and second lunches, the secretary did a great job at point of sale recognizing reimbursable meals and directing students to take more fruits and/or vegetables if necessary.
- The School nutrition professions worked well together, getting the middle school students through the line in a timely manner.

Webster Stanley Elementary School

- The breakfast school nutrition professional did a great job serving breakfast to all the students, even though she was doing it by herself.
- She also has a great rapport with all the students!
- The nutritional professionals serving lunch served the students in a friendly and engaging manner and some students volunteered as serving helpers.

Smith Elementary School

- The school nutritional professionals were engaged with the children and it was apparent they enjoyed their jobs.

Thank you to everyone for serving healthy meals to the students of Oshkosh Area School District!

Technical Assistance and Program Requirement Reminders

Production Records

- Production records are useful tools to record information prior to production, during production, and following production. The current production record templates are difficult to read and may be challenging for staff to understand.
- Be specific on production records regarding the fruit or vegetables sizes (e.g. case count). Instead of “baked potato, 1 each,” specify the case count of the potatoes as different sizes credit differently.
- While there is no required production record template, there are some examples that may be used on our [Production Records](#) webpage. A copy of the production record requirements “[Must Haves and Nice to Haves](#)” list can also be found at that link (<https://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. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes.

- Oshkosh has standardized recipes, but the product descriptions are not always specific and the instructions are sometimes unclear. Work to update recipes to be straight-forward so staff understand exactly how to make these recipes.
- Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).
- A turkey sandwich recipe provided off-site did not list the type of turkey and the crediting was unclear. The recipe was discussed onsite and an updated recipe provided.

Documentation

- Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, and sodium), ingredient list, and crediting information must be available onsite.
- Documentation should be updated at least twice per year and as new products are purchased or substituted.

Cheese Sticks

Placement on the Line

- All salads served at the high school come with either one or two cheese sticks (1.0 oz eq M/MA or 2.0 oz eq M/MA), two whole grain-rich dinner rolls (1.0 oz eq each for a total of 2.0 oz eq grain), and non-creditable croutons.
- During the day of onsite at Oshkosh West High School, each salad option was presented in a shallow pan that also had the dinner rolls and croutons. However, in the middle pan was a yogurt parfait option, which had the cheese sticks available.
- The line set up made it seem like the cheese sticks only went with the yogurt parfait option and not the salad options. There was no signage telling students they could select one (or two, dependent on the salad) cheese sticks with their salad.
- It was unclear if students knew they could select that with their salad options. There was also no signage telling students they could select up to two dinner rolls with their salad option.
- Consider adding signage stating what students are allowed to select, or readjust the presentation of the salads so that the cheese sticks are available next to each salad option.

Frequent Menu Option

- Cheese sticks are offered as a M/MA for a number of menu options (all salads, soup, nachos, etc.).
- Consider offering a variety of M/MA options instead of pairing a cheese stick with everything or increase the M/MA offering of the main entree (e.g. increase the serving size taco meat or shredded cheese instead of adding a cheese stick to meet the daily minimum).
- Examples of other M/MA options include peanut butter, hard-boiled egg, yogurt, nuts and seeds (which can only meet up to half the daily M/MA offering), etc. For more ideas, visit the [USDA Food Buying Guide \(FBG\)](https://foodbuyingguide.fns.usda.gov/Home/Home) (<https://foodbuyingguide.fns.usda.gov/Home/Home>).

Printed Menu

- The high school printed menu states the following:

“A LUNCH COMBO is any 3 to 5 different meal components. Menu choices include 1 milk, 1 entree (= 1 meat/meat alternate + 2-3 grain/bread), 1 full serving (2 - ½ cups), fruit, and/or 1 (2 - ½ cups) vegetable. A combo MUST contain ½ cup fruit or ½ cup vegetable in the full portioned amount.”

- There are a couple of things incorrect with this statement. Firstly, high school students must be allowed 2.0 oz eq meat/meat alternate, not 1.0 oz eq.
- Secondly, the ½ cup fruit or ½ cup vegetable in the full portioned amount is confusing as the full portioned amount for a fruit is 1.0 cup and for vegetable is 1.0 cup.
- To satisfy the fruit/vegetable portion of a reimbursable meal, a student only needs ½ cup fruit and/or vegetable.
- Consider updating to a variation of the following statement:

“A meal component for a high school student includes: 2.0 oz eq meat/meat alternate, 2.0 oz eq grain, 1 cup fruit, 1 cup vegetable, or 1 cup milk. A reimbursable meal must contain at least three of the five different meal components and one of these must be at least ½ cup fruit and/or vegetable.”

Offer versus Serve

- It is important for everyone (school nutrition professionals, school staff, teachers, and volunteers) working with the National School Lunch Program (NSLP) to fully understand the OVS requirements.
- The [Offer Versus Serve Guidance Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) and the [Offer Versus Serve Webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) can be used as a training resource (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf and https://dpi.wi.gov/school-nutrition/training/webcasts).
- Point of sale was at the beginning of the serving lines at both elementary schools. However, trays were not being monitored at the end of the line, as there was not enough staff to cover all areas of the serving line. This led to some non-reimbursable meals.
- At Webster Stanley Elementary, twenty non-reimbursable breakfast meals and ten non-reimbursable lunches were observed.
- At Webster Stanley Middle School, seven non-reimbursable lunches were observed. Many students were sent back for more fruits and/or vegetables to ensure the meal contained at least ½ cup total.
- Portion sizes served must be full, level scoops in standardized measuring utensils.
- Fruit cocktail was the only fruit offered on the day of review at Second Chance School. A full 1.0 cup of fruit cocktail must be offered with the reimbursable meal. However, students may choose to take only ½ cup of fruit cocktail under OVS if they do not select any vegetables.
- At Second Chance School, staff inappropriately offered students choices within the vegetable component that restricted access to the full, planned portion sizes. Full, planned portion sizes must meet daily and weekly meal pattern requirements.
- For example, during lunch meal observation on December 12, school staff asked students if they would like corn or grape tomatoes, when students should have been offered both.
- Students were also being served ½ cup of the selected vegetable and not asked if they would like more.

Juice

- Although unlimited fruits are allowed at breakfast, consider limiting students to the number of juices they are allowed to select. Multiple students selected two juices and even one student selected three.
- Students should be encouraged to select whole, fresh fruits, which contain fiber, keeping students full longer.

Signage

- Adequate signage helps ensure that students accurately select reimbursable meals. At Oshkosh West High School breakfast signage was available on an inside wall in the serving line; however, there were many edits made to it using tape and it had some inaccurate and confusing information.

- Signage should clearly communicate what is offered to students as part of a reimbursable meal. The lunch signage should list the five components and inform students that under OVS, they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination.
- The breakfast signage must list the three components and the four items offered, and must communicate to students that under OVS, they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination.
- No matter the signage used, it must state “the students must select at least three full components, one of which is ½ cup fruit and/or vegetable, or a combination.”

3. RESOURCE MANAGEMENT

NONPROFIT SCHOOL FOOD SERVICE ACCOUNT

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The consultants addressed financial topics with the Assistant School Nutrition Director, who is very knowledgeable about the flow of monies in the school nutrition Fund 50.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency’s account. Both resources are accessible from our [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).

Annual Financial Report (AFR)

- 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. The new [Annual Financial Report instructions](#) are located on the DPI 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, at which point the deposit account is converted to revenue. 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 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 “nonprogram foods”, 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, a la carte, and caterings 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 an NSLP food expenditure for private schools and a purchased service for public schools.

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.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- 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

- Oshkosh Area School District has an unpaid meal charge policy which is communicated to households in the beginning of the school year. 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
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

PAID LUNCH EQUITY (PLE)

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the Paid Lunch Equity tool and adhering to the pricing requirements.
 - Refer to the [PLE ‘In a Nutshell’](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf) for more information on the PLE tool (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf>).
 - Refer to the most recent [memo](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf) from DPI (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf>).
 - Refer to the most recent [guidance memo](https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf) from USDA (<https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf>).

REVENUE FROM NONPROGRAM FOODS

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch and paid milks for the Wisconsin School Day Milk Program), Vended Meals (meals sold to other agencies), and Catering events.
- 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.
- (TA) The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xls>).

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

Adult Meals

- Adult meals are correctly priced at Oshkosh Area School District.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals (<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 (2018-19 SY) should be used to determine adult prices.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

INDIRECT COSTS

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, waste removal, printing and mailing services, administrative oversight, etc.
- (TA) Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local reality broker who has knowledge of current rates for rent of similar facilities).

- Utility charges - separately metered or current usage study by the local utility company.
- Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

4. GENERAL PROGRAM COMPLIANCE

CIVIL RIGHTS

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

- (TA) When including the [non-discrimination statement](#) 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 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). 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

- (TA) “And Justice for All” posters need to be posted in public view where the program is offered.

Civil Rights Training

- Civil rights training is conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program; documentation was available for review.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form (PI-1441) is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

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>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA

develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits.
- (TA) When symbols are used to identify meal status, they should be changed periodically.

Processes for complaints

- All verbal or written civil rights complaints alleging discrimination within the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or the State Agency (DPI School Nutrition Team) within 5 days, per FNS Instruction 113-1 (Section XVII Section C, paragraph 2). You will want to make sure that this is included in the district procedures to ensure compliance.
- Additionally, per FNS Instruction 113-1, if an individual makes allegations of discrimination *orally* and “is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements” of the allegation for said individual. (Note: The items which should be included in the write up are listed in FNS Instruction 113-1.) Such complaints should then be forwarded to the State or Regional office, as appropriate, within the established timeframes.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. An 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 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).

ON-SITE MONITORING

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The onsite monitoring forms have been completed for school sites for the 2018-19 school year for lunch and breakfast programs.

LOCAL WELLNESS POLICY

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- 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 be in compliance by June 30, 2017.
- (TA) USDA requires schools/districts to establish policies for food/beverage marketing. At a minimum, schools may only allow for foods and beverages that meet the Smart Snacks standards to be marketed/advertised.

SMART SNACKS IN SCHOOLS

Commendations and Appreciations

- Wildcat Cafe, which is run by a special needs class, sells compliant products. This teaches students real-life skills of handling money, working with customers, and selling product.
- This also ensures that students and staff in the school have access to products that are within the sugar, calories, saturated fat, and sodium levels.
- Great job to the teachers that help run this program that understand and follow smart snack regulations. They had a binder with smart snack calculator print outs and were very knowledgeable about the regulations. Thank you!
- The Food Service Department has a great understanding of the Smart Snack regulations, ensuring all ala carte items are compliant and keeping the required documentation.
- All entities with in the district have been informed of the regulations, good job!

Technical Assistance and Program Requirement Reminders

- The cafe is a great space. I would encourage the food service department to partner with the cafe on future offerings, which could benefit everyone!

Milk, A la carte

- Milk is an allowable a la carte option for all age/grade levels. It must be fat-free or low-fat, flavored or unflavored and be in 8 fluid ounces (fl oz) or less for elementary students and 12 fl oz or less for middle and high school students.
- For more information on Smart Snack requirements visit the [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf>).

Fundraisers

- 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.
- The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal regulations.

PROFESSIONAL STANDARDS

Commendations/Comments/Technical Assistance (TA)/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.

- Wisconsin DPI allows the SFA the flexibility for training requirements to be met across two years, but some training needs to occur each year.
- The [hiring standards for SFA directors](#) 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>).

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.).
- (TA) 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.

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 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.

WATER

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.
- (TA) Most sites had water available for each meal service, but not all on the days of review. Please review the procedures to adhere to this requirement at each site and communicate with serving staff.

FOOD SAFETY AND STORAGE

Commendations/Comments/Technical Assistance (TA)/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). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.
- The reviewers witnessed hair restraints, gloves, aprons and thermometer usage as food safety practices.

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.
- Food safety inspection reports are posted in public view.

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Documentation was available for review onsite.

Food Safety Plans

- The Food Safety Plan was available for review. All temperature logs were up-to-date.
- 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.

Food Employee Reporting Agreements

- (TA) All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. 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

Technical Assistance and Program Requirement Reminders

- The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, farmers, and provides healthy choices for children in the USDA School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed by, manufactured by, or packed in, the U.S, but the country of origin is not listed, this product requires additional information from the distributor on where the product is originally from.
- More information on this new requirement, including a tool to assist with tracking noncompliant 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>).

REPORTING AND RECORDKEEPING

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- This is a link to the current [Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf) for general type schools (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf>).

SCHOOL BREAKFAST PROGRAM (SBP) AND SUMMER FOOD SERVICE PROGRAM (SFSP)

OUTREACH

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

School Breakfast

- At the beginning of the school year, the SFA notified families of the availability of the School Breakfast Program through a newsletter and monthly through menu highlights.

- National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.
- Continue to promote participation in the School Breakfast Program for better participation.

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. A Summer Food Service Program is operated at Oshkosh Area School District and the SFA informs their families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via a variety of methods.

5. OTHER FEDERAL PROGRAMS REVIEWS

FRESH FRUIT AND VEGETABLE PROGRAM (FFVP)

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- As a reminder, nutrition education is essential to the success of the program but additional funding is not available through the grant to purchase nutrition education materials. Free materials can be ordered from the USDA's [Team Nutrition order form](https://pueblo.gpo.gov/TN/TNPubs.php) (https://pueblo.gpo.gov/TN/TNPubs.php). Other materials can be accessed through the [Wisconsin Team Nutrition](https://dpi.wi.gov/team-nutrition/nutrition-education) webpage (https://dpi.wi.gov/team-nutrition/nutrition-education).
- Classroom teachers are allowed to participate with the students in the FFVP snack but that they are the only adults that are allowed to. Teachers can be powerful role models for students. While eating the FFVP snack with students, teachers have the opportunity to model healthy eating behaviors. This can be an effective way to reinforce nutrition education lessons and encourage reluctant students to try the snack. However, teachers are not required to participate and no additional funding is provided in the grant for teachers. If a classroom has both a teacher and a teacher's aide, the teacher's aide can be permitted to participate in the FFVP snack in place of the teacher if they have direct involvement with the students. See page 10 of the USDA's [FFVP Handbook](http://www.fns.usda.gov/sites/default/files/handbook.pdf) for more information (http://www.fns.usda.gov/sites/default/files/handbook.pdf).
- Offering a cooked vegetable can be allowable if certain criteria are met. This is mentioned on page 15 of the USDA's FFVP Handbook. The vegetable must be purchased fresh and cooked in house. Additional ingredients should not be added during the cooking process as the goal is still to connect students with the flavor of the actual vegetable. The vegetable that is cooked should be one that is not normally eaten raw and it must be offered as part of a nutrition education lesson. Cooked vegetables are limited to one time per week.

SPECIAL MILK PROGRAM

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- PreKindergarten students at OASD are served milk in the Special Milk Program. A great process of distributing and counting milks was observed at Webster Stanley Elementary School.

WISCONSIN SCHOOL DAY MILK PROGRAM (WSDMP)

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Wisconsin School Day Milk Program is being operated correctly by teachers entering into Infinite Campus the students selecting milk at milk break.
-

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

MEAL COUNTING AND CLAIMING

Findings and Corrective Action Needed: Meal Counting and Claiming

- **Finding #1:** The individual site edit check was not used to determine the number of reimbursable meals to claim by eligibility for claim submission.
Corrective Action Required: Please submit lunch and breakfast edit checks for all months since the beginning of the school year and your edit check for the month of December that you will use to submit the December claim for breakfast and lunch for the reviewed sites. That will be lunch for West High, Smith Elementary, Webster Stanley Middle and Webster Stanley Elementary, plus breakfast for West High School and Webster Stanley Elementary. Fiscal action will be calculated from the beginning of the school year.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

□ **Finding #2: Signage**

Signage must be posted and visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. There was no signage posted at the following schools:

- Smith Elementary (breakfast and lunch signage)
- Oshkosh West High School (lunch signage)

Breakfast and lunch signage was observed but lacking necessary information at Webster Stanley Elementary, Webster Stanley Middle School, and Second Chance School. Current signage did not list what was offered for the day's meal and the statement "*the students must select at least three full components, one of which is ½ cup fruit and/or vegetable, or a combination*" was not accurate on the sign. Please ensure all the signage throughout the district is correct.

Corrective Action Required: Please submit pictures of signage posted at the schools listed above showing the day's reimbursable meal option(s) with the required statement.

□ **Finding #3: Production Records**

Current Production Records for lunch and breakfast are missing the following required information:

- the menu item with recipe number/reference number
- total number of purchase units prepared
- total number of portions prepared
- planned portion size
- actual usage for condiments
- any extra menu items
- substitutions made to original plans

Corrective Action Required: Submit one week of completed lunch production records with all the required information.

Finding #4: Weekly Meat/Meat Alternate Shortage

During the week of review on Tuesday, November 6, 2018 the menu planner planned:

- Chicken and gravy - credits as 2.0 oz eq meat/meat alternate
- A Jamwich - credits as 1.0 oz eq meat/meat alternate and 1.0 oz eq grain offered with a 1.0 oz cheese stick - credits as 1.0 oz eq meat/meat alternate for a total of 2.0 oz eq m/ma and 1.0 oz eq grain.

Current production records are in multiple forms, multiple pages, and in multiple locations. During the week of review the cheese stick did not make it from the planned menu to the schools and onto the service lines. This resulted in a weekly meat/meat alternate shortage at lunch.

Corrective Action Required: Submit a statement explaining how the meat/meat alternate shortage will be corrected for the week of review. Include specific serving sizes, product labels, and what days the changes will be made.

Finding #5: Offer versus Serve

During the on-site portion of the review, school nutrition professional and volunteers were somewhat unclear about the OVS requirements for lunch and breakfast. Non reimbursable meals were observed. It is important for all individuals involved in NSLP and SBP to fully understand the OVS requirements.

Corrective Action Required: Submit a plan for OVS training and include which tools were used (e.g. OVS webcast, in-service training, etc.). Include a signed roster from school nutrition professional at Webster Stanley Elementary and Middle schools, Smith Elementary school, and Second Chance School that attended this training.

Finding #6: Standardized Recipes

During the on-site breakfast observation at Oshkosh West High School, a coffee beverage was prepared for a student. However, no recipe or crediting documentation was provided. To ensure compliance with the Smart Snacks Standards for ala carte items, documentation must be provided.

Corrective Action Required: Provide the PHN with:

- Standardized recipe for the coffee drinks being offered at the high school
- Product labels

3. RESOURCE MANAGEMENT

NONPROFIT SCHOOL FOOD SERVICE ACCOUNT

NONPROGRAM FOODS

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

Finding #7: The Nonprogram Foods Revenue Tool has not been completed for the current or previous school year.

Corrective Action Required: Submit a completed USDA or DPI NonProgram Food Revenue Tool to the consultant. **Completed the USDA tool onsite; no further action required.**

4. GENERAL PROGRAM COMPLIANCE:

CIVIL RIGHTS

Findings and Corrective Action: Civil Rights

- Finding #8:** At the high school, meal prices for student meals (i.e., \$2.75, .40, 0.00) are visible on the computer screen that can be seen by students; this constitutes overt identification. There were sticky notes to cover some parts of the screen but the price was still visible.

Corrective Action Required: Work with the software system provider to hide the identifying prices according to student eligibilities. Submit a statement of how this practice was resolved.

SMART SNACKS IN SCHOOLS

Findings and Corrective Action Needed: Smart Snacks in Schools

- Finding #9: Fundraisers**

Fundraisers are not currently tracked district wide.

Corrective Action Required: Submit a summary outlining who will be responsible for oversight of Smart Snack regulations within Oshkosh Area School District. Include examples of education provided to all involved with the sale of food and beverage items (i.e. FFA) in the school district and include details as to how various groups will ensure compliance with these regulations.

PROFESSIONAL STANDARDS

Findings and Corrective Action: Professional Standards

- Finding #10:** Training hours/continuing education is not being monitored on a tracking tool for all school nutrition staff.

Corrective Action Required: Submit a statement of the process Oshkosh Area School District school nutrition will develop to include training hours for each school nutrition employee. The tracker must include the name of each staff member, date hired, title or position duties, full or part-time status and staff category (i.e., director, manager, staff).

FOOD SAFETY

Findings and Corrective Action: Food Safety

- Finding #11:** The food safety plan had the SOPs for the Process 1-2-3 food or beverage items, but these items were not identified for production or school site serving staff.

Corrective Action Required: Submit a statement of the process to identify Process 1-2-3 items.

- Finding # 12:** Food Employee Health Reporting Agreements must be on file for each person working with food items.

Corrective Action Required: Submit a statement of the process to retain Employee Health Reporting Agreements for food staff. **The process to retain employee agreements was started 12-13-18 and will continue until completed. No further action required.**

BUY AMERICAN

Findings and Corrective Action: Buy American

- No corrective action for the Buy American section of the review. All non-compliant products had documentation.

5. OTHER FEDERAL PROGRAMS REVIEWS

FRESH FRUIT AND VEGETABLE PROGRAM

Findings and Corrective Action: Fresh Fruit and Vegetable Program

❑ **Finding #13:** Documentation provided for operating labor for Webster Stanley Elementary demonstrated both over- and underclaiming. When claiming operating labor, the FFVP timesheet labor hours for each employee are divided between the three schools the labor is for. When dividing each employee's labor hours by three, both over- and underclaiming occurred because labor was rounded to the nearest two decimal places. However, Online Services allows for more than two decimal places to be entered for more accurate claiming.

One school nutrition professional worked 0.50 hours but 0.51 hours were claimed between the three schools, resulting in an overclaim of \$0.04 for Webster Stanley Elementary. Another school nutrition professional worked 4.00 hours but 3.99 hours were claimed between the three schools, resulting in an underclaim of \$0.09 for Webster Stanley Elementary.

Over- and underclaiming also occurred due to hours not being accurately calculated on the FFVP timesheet. One school nutrition professional worked 9.91666 hours but only 7.32 hours were claimed between the three schools, resulting in an underclaim of \$8.66 for Webster Stanley Elementary. Another school nutrition professional worked 7.41666 hours but only 5.86 hours were claimed between the three schools, resulting in an underclaim of \$6.49 for Webster Stanley Elementary. A school nutrition professional worked 0.75 hours but 1.26 hours were claimed between the three schools, resulting in an overclaim of \$5.10 for Webster Stanley Elementary.

Adequate funding was available and budgeted in the operating labor category to cover these costs. There was a total overclaim of \$5.14 and underclaim of \$15.24 for a total \$10.10 underclaim. Fiscal action will not be assessed.

Corrective Action Required: After submission of the January 2019 claim, submit supporting documentation for operating labor for Webster Stanley Elementary to the FFVP Public Health Nutritionist. *This corrective action will be outside of the Administrative Review process and will take place before the January 2019 claim is paid.*

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).



With School Nutrition Programs!