

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

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**School Food Authority: Winneconne Community School District    Agency Code: 706608**

**School(s) Reviewed: [1204] New Horizons (K-12)**

**Review Date(s): 2/6/19-2/8/19**

**Date of Exit Conference: 2/8/19**

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

**General Program Reminders/Updates:**

- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://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 (<http://www.fns.usda.gov/healthierschoolday>). The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products.
- [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 Winneconne Community School District for the courtesies extended to us during the review and for being available to answer questions and provide requested documents. Overall, the agency is running an excellent program. Staff were receptive to recommendations and regularly attend trainings to stay current on program regulations. The district is fortunate to have a food service director with over 20 years of experience. Thank you for all you do to serve the students in your community!

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Technical Assistance (TA)/Compliance Reminders

186 meal eligibility determinations were reviewed, 5 errors were identified. The error rate is 2.688%, which is below the threshold to take fiscal action or require an independent review of applications. All errors need to be corrected as outlined on the SFA-1 and SFA-2 forms.

##### Carryover

For up to 30 *operating* days into the new school year (or until a new eligibility determination is made, whichever comes first) an individual child's free or reduced price eligibility status from the previous year will continue within the same LEA. When the carryover period ends, unless the household is notified that their children are directly certified or the household submits an application that is approved, the children's meals must be claimed at the paid rate. Though encouraged to do so, the LEA is not required to send a reminder or a notice of expired eligibility.

##### Direct Certification

- Thank you for running the Direct Certification matches in the required periods, when you receive a new student and other times to pick up newly eligible students.
- Districts may not run students who are open enrolled in other districts. These students must be omitted from the software input file. *Districts may not run students that are enrolled in private schools (unless the district lists the school on their child nutrition contract as part of an Alternate School Food Authority Agreement or CESA).* The aforementioned statement applies to New Horizons.

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

- Finding #1:** Student certification and benefit issuance errors as outlined on the SFA-1 and SFA-2 forms.

**Corrective Action Needed:** For student A, contact the household and obtain clarification. If the household does not have a correct case number, obtain income information. Date and initial the communication on the application. If the reported income qualifies them at the reduced level, or is denied, send a letter of adverse action.

For all other student errors, send a letter of adverse action to the household providing 10 *calendar* days to appeal. Day 1 is the date the letter is sent. Submit a copy of the SFA-1 and SFA-2 forms with the "Date of Correction" column filled out. The date of correction is the date the adverse action letter is sent.

- Finding #2:** The SFA did not provide 30 *operating* days of carryover. Carryover was cut-off on October 8, which is calendar days.

**Corrective Action Needed:** Submit a statement of understanding that the SFA will provide 30 operating days of carryover each school year, or until a new eligibly determination is made, whichever comes first.

#### Verification

### **Technical Assistance (TA)/Compliance Reminders**

- The confirming official checks only the selected application(s) for accuracy **before the verifying official contacts the household(s)**. The confirming official signs and dates the application or the tracking tool when the review is complete.
- The [Verification Tracker Form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form-1819.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form-1819.docx) can be used to assist the agency in tracking the verification process. Include a copy of the application with this form.
- Consider using the DPI SNT [Verification Letter Templates](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) that are posted on our website and updated annually. **If you choose to utilize the software templates, ensure they are clear, and compliant.**

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

✓ **Finding #1:** The confirmation review was not completed.

**Corrective Action Needed:** By signing off on this report, the SFA agrees to complete and document the confirmation review prior to sending the “We Must Check” letter.

**Completed. No further action required.**

❑ **Finding #2:** The Verification process was not completed by November 15 and was incorrectly reported on the Verification Collection Report (VCR). The VCR can no longer be amended.

**Corrective Action Needed:** Watch the [Verification](#) and [Submitting the Verification Collection Report](#) webcasts posted on the [SNT website](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/verification/story\_html5.html; https://media.dpi.wi.gov/school-nutrition/submitting-the-verification-collection-report/story.html; https://dpi.wi.gov/school-nutrition/training/webcasts#verif). Submit the email confirmation page as proof of viewing.

### **Meal Counting and Claiming**

#### **Technical Assistance (TA)/Compliance Reminders**

##### Edit Check

Regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools’ lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made. The [daily participation/edit check form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc) is provided for those manually consolidating claims—or without a software edit check function. School agencies are not required to use this particular form but must perform an edit check after completing the calculations shown on the bottom of the form. Those school agencies with computerized meal counting systems must still review the edit check report prior to online claim submission.

### **Findings and Corrective Action Needed: Meal Counting and Claiming**

- ❑ **Finding #1:** Systemic claim consolidation error at the non-review sites for lunch. SFA did not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim

for reimbursement per 7 CFR 210.8. The SFA is using the wrong software report and therefore not completing the required monthly edit check.

**Corrective Action Needed:**

- a) Submit a statement agreeing to review the edit check reports monthly.
- b) Submit the February NSLP edit check reports for all sites once the claim is submitted online.
  - Fiscal action will be calculated at the non-review sites for NSL back to the beginning of the school year. Edit check reports for these months were obtained on-site.
  - During future onsite monitoring reviews, make sure to check your point of sale counting system district-wide as an internal control for managing this critical area.

**2. MEAL PATTERN AND NUTRITIONAL QUALITY**

**Commendations**

Thank you to the staff at New Horizons for their warm welcome and cooperation throughout the administrative review. Thank you, also, for all your questions, willingness to learn and quickly implement recommendations and required changes. It has been a pleasure working with your staff.

**Comments/Technical Assistance/Compliance Reminders**

**Week of Review - Compliance with the Meal Pattern**

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily and weekly meal pattern requirements, including vegetable subgroups, independently. Because students are only able to select one entrée option, each entrée option offered is viewed as one “line.” Additionally, since New Horizons is a K-12 school the K-8 and 9-12 age/grade groups must be evaluated separately at lunch because there is no overlapping meal pattern.

For an explanation for how to ensure that when multiple entree options are offered, the meal pattern can still be met, refer to question 1 on page 37 of [Memo SP 10-2012 \(v.9\) Questions & Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf).

The following is an example using the guidance found in the abovementioned memo, but applying an entree situation from New Horizons:

Example: At breakfast students may only select one entree (cereal or cereal bar or poptart, etc). Since the cereal and cereal bar only credit as 1 oz eq grain, the minimum weekly offering is 5 oz eq grain (1 oz eq x 5 days). This entree would not meet the required weekly minimum for breakfast of 9 oz eq grain.

The following list details the meal pattern violations found for the week of review (December 10-14, 2018):

**Breakfast K-12**

- **Weekly grain shortage**
  - Cereal and cinnamon crisps options provide 1 oz eq grain. Since students may only select one entree option, over the course of the week students only have access to 5 oz eq grains, which is short the required 9 oz eq grain minimum.

**Lunch K-8**

- **Daily Vegetable Shortage (bag lunch).** Only ¼ cup carrots were offered as part of the bag lunch on Friday. K-8 students must be offered a minimum of ¾ cup vegetable daily.
- **Missing vegetable subgroup.** The beans/peas/legumes vegetable subgroup was not offered.
- **Daily Grain Shortage.** The crispy chicken salad served on Monday only provided 0.5 oz eq grains from the breaded chicken patty. This is short the daily minimum of 1 oz eq grain for K-8 students.
- **Weekly grain shortage.** 4.75 oz eq grain offered. 8 oz eq grain is the required weekly minimum
- **Missing Grain Component.** On Tuesday, the chicken and gravy entree did not have access to a grain, therefore is considered a missing component. *Missing components are subject to Fiscal Action.*
- **Weekly meat/meat alternate shortage.** Only 6 oz eq meat/meat alternate offered over the course of the week for K-8 students. 9 oz eq meat/meat alternate is the required minimum.

#### Lunch 9-12

- **Daily fruit shortage (bag lunch).** Bag lunches served on Friday only offered ½ cup apples. This is short the daily minimum requirement of 1 cup for high school (9-12) students.
- **Daily Vegetable Shortage (bag lunch).** Only ¼ cup carrots were offered as part of the bag lunch. High school students (9-12) must be offered 1 cup vegetable daily.
- **Missing vegetable subgroup.** The beans/peas/legumes vegetable subgroup was not offered.
- **Daily Grain Shortage.** High school students (9-12) must be offered at least 2 oz eq grain daily.
  - Chef salad served on Monday only provided 1.25 oz eq grain.
  - PBJ served on Monday and Tuesday only provided 1 oz eq grain.
  - Chicken tenders on Wednesday only provided 1 oz eq grain.
- **Weekly grain shortage.** 7.75 oz eq grain offered. 10 oz eq grain is the required weekly minimum.
- **Missing Grain Component.** On Tuesday, the chicken and gravy entree did not have access to a grain, therefore is considered a missing component. *Missing components are subject to Fiscal Action.*

#### Onsite Meal Observation

During the onsite observation of lunch, it was noted that each of the prepared chef salads looked slightly different. One had cucumbers, but the others did not. One had tomatoes, the others did not. These changes/substitutions were not recorded on production records. This did not create any meal pattern issues, but technical assistance was provided on the importance of following the recipe as written and how to handle substitutions when they are necessary.

Any changes to the planned menu must be documented on the production record. A substitution should be a food that credits comparably to the original planned item, have a similar nutrition profile, and belong to the same vegetable subgroup (when applicable) to the extent practicable. However, it is always better to substitute something creditable, rather than have a missing component. Line staff and the menu planner will want to evaluate that the substitution does not have an impact on compliance with daily or weekly meal pattern requirements.

In addition, the main entree for the day of onsite observation was a tater tot casserole. Crediting of the recipe revealed that only 1.5 oz eq meat/meat alternate was provided by this meal versus the intended 2 oz eq meat/meat alternate as listed in the recipe. Technical assistance was provided to the food service director on how to credit the beef crumbles in this recipe, and the recipe was immediately updated with an increased amount of crumbles to provide the intended crediting. *Thank you!*

Going forward the menu planner will need to ensure that high school students always have access to the minimum 2 oz eq grain and meat/meat alternate daily. It is strongly recommended to provide

products/entree options that equal at least 2 oz eq grain and/or meat/meat alternate (versus bundling items) so that it is easy to identify full components for determining reimbursable meals.

### **School Breakfast**

New Horizons does breakfast in the classroom. The point of service was handled nicely with only one person in charge of bringing the food to the classrooms and counting the meals for reimbursement.

Breakfast signage was posted on the cart and filled in with the daily menu. However, the signage did not specify the number of food items that each menu item was planned as nor the number of items from each component that students could select. Technical assistance was provided on adding this information to the signage so that it is clear what students may select.

It is up to the menu planner to determine in advance whether items crediting as 2.0 ounce equivalents (oz eq) count as one or two food items. He or she must clearly communicate to students what foods they can (must) select in order to have three food items for a reimbursable breakfast. (For example, the banana bread served on the day of observation was 2.0 oz eq, so it could be counted as either one or two food items).

### **Production Records**

Production records are required as documentation that your school is serving reimbursable meals that contain all required meal pattern components; they prove that reimbursable meals were served. Currently there are two production records in use. One is for elementary and middle school and one for high school. However, it was difficult to distinguish between the two, because they do not clearly identify the age/grade groups. The difference is only indicated by a number 1 or 2 after the site name. For greater clarity, please write/type in the age/grade groups (meal pattern) served on each of your production records templates.

In addition, the following information is needed:

- Number of meals ordered for both students and adults.
- Number of meals served for both students and adults.
- All food items offered as part of a reimbursable meal.
  - On the breakfast production records the type of fruit served each day was not recorded on the production record. The specific type(s) of fruit offered, along with planned portion size(s), must be included to document this component was planned and served. The production record must also reflect substitutions, if any are made.

Consider using DPI's [Transport Sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/transport-sheet.pdf) template, which contains the space to include all the required information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/transport-sheet.pdf>). Production Record templates are found on our [Production Record](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

### **Menu Planning**

Menu planning worksheets are very helpful tools to ensure meal pattern requirements are met at both breakfast and lunch (particularly vegetable subgroup requirements). It may be helpful to write out the intended menu for each grade group served to ensure that the meal pattern is met. DPI has the following templates for each of the grade groups served at New Horizons:

- [K-8 School](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc) (Lunch) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc)
- [9-12 High School](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc) (Lunch) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc)
- [K-12](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx) (Breakfast) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx)

These can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage, under the Menu Planning Tools heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools).

### Standardized Recipes

Use of standardized recipes is another important part of USDA School Meals Programs. Any menu item that has more than one ingredient must have a standardized recipe. These recipes have been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock.

Visit our [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for resources regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. We also encourage viewing the webcast, [What's the Yield with Standardized Recipes?](https://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes; https://dpi.wi.gov/school-nutrition/training/webcasts#sr).

Please review, update and/or add the following information to your recipes:

- Age/grade groups served, including different serving sizes, if applicable.
- Crediting. Recipes did not always list the correct crediting.
- All food items included in the recipe are documented. For example, according to the food service director a breadstick was served with the crispy chicken salad, however, no breadstick was listed on the recipe.
- Detailed instructions

### Crediting Documentation

As discussed onsite, for processed potato products like the Au Gratin Potato Casserole, ensure that the serving size is determined by first determining the weight of the product and the intended crediting. For example, the product formulation statement for this product states that 5.62 oz (by weight) of casserole must be served in order to credit as ½ cup vegetable. The school had not checked the weight of their ½ cup serving size, therefore the crediting of this menu item could not be determined. Fortunately, due to many vegetable offerings for all students, this did not create any meal pattern issues. For future use of this product, be sure to verify that a ½ cup serving size does indeed weigh 5.62 oz. If it does not then you may need to adjust your scoop size either larger or smaller to accommodate that weight of product. It would also be helpful if a note was added to the PFS to indicate that the food service director and/or line staff verified this.

### Field Trip Bag Lunches

Students on a field trip must be offered lunches that meet daily meal pattern requirements. Since both K-8 and 9-12 students are being served, the bag lunch must meet each of their specific meal pattern needs. As noted above, K-8 students must be offered at least ½ cup fruit, ¼ cup vegetable, 1 oz eq grain, 1 oz eq meat/meat alternate and 1 cup milk daily. 9-12 students must be offered at least 1 cup fruit, 1 cup vegetable, 2 oz eq grain, 2 oz eq meat/meat alternate and 1 cup milk daily.

In addition, specific procedures must be followed for maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way to collect meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types.

For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>)

### **Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality**

#### **❑ Finding #1: Weekly grain shortage at breakfast.**

**Corrective Action Needed:** Update breakfast signage that is posted on the cart with the daily menu. Make sure to specify the number of food items that each menu item is planned for and the number of items from each component that students can select. To correct the weekly grain shortage, it is recommended that students be able to select to up two 1 oz eq grain items. Submit a picture/scan of this updated signage. If new products are added, include the crediting documentation.

#### **❑ Finding #2: Daily vegetable shortage and daily fruit shortage at lunch (bag lunch) for both K-8 and 9-12 grade groupings.**

**Corrective Action Needed:** Submit a statement explaining how the bag lunch menu will be changed to fix the daily vegetable and fruit shortages and bring it into compliance for both age/grade groups (K-8, 9-12). If you offer any different products, please send the crediting documentation. Additionally, update the bag lunch recipe and bag lunch order form for clarity.

#### **❑ Finding #3: Missing vegetable subgroup (beans/peas/legumes) at lunch for K-8 and 9-12.**

**Corrective Action Needed:** Complete a menu planning worksheet for the week of review (December 10-14, 2018) for lunch with the changes you will make to bring the week into compliance for both age/grade groups (use these worksheet templates: [K-8](#) and [9-12](#)) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc>). Make sure that all vegetable subgroups are offered in their required amounts, and that both daily and weekly minimums are met for grains and meat/meat alternates.

#### **❑ Finding #4: Daily grain shortage at lunch in crispy chicken salad for K-8.**



**Corrective Action Needed:** Submit a statement that explains how the crispy chicken salad recipe will be fixed to correct the daily grain shortage to bring it into compliance for the K-8 grade group. If you offer any different products please send the crediting documentation. In addition, submit the updated recipe.

**❑ Finding #5: Missing grain component at lunch in the chicken and gravy entree for both K-8 and 9-12 grade groups.**

**Corrective Action Needed:** Submit a statement that explains how the chicken and gravy entree will be fixed to correct the missing grain component for K-8 and 9-12 grade groups. If different products are used, please send the crediting documentation. In addition, submit the updated recipe.

**❑ Finding #6: Daily grain shortage at lunch in chef salad, PBJ and chicken tender entrees for 9-12.**

**Corrective Action Needed:** Submit a statement that explains how the chef salad, PBJ and chicken tender entrees will be fixed to correct the daily grain shortage to bring them into compliance for the 9-12 grade group. If you offer any different products please send the crediting documentation. In addition, submit the updated recipes.

**❑ Finding #7:** Production records do not include all the required information. Number of meals ordered and served and details about the type of fruit served at breakfast were not included.

**Corrective Action Needed:** Update the production record template for both breakfast and lunch to include this information. You may reference DPI's [production records requirement list](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). Submit one week of completed breakfast and lunch production records of a week of your choosing (after the administrative review but before the corrective action due date).

**❑ Finding #8: Recipes missing key pieces of information.**

**Corrective Action Needed:** The following recipes need to be updated:

- Garden bar elementary - add instructions, update vegetables listed to current vegetables in use. Review serving sizes.
- PBJ pocket - identify age/grade groups, update crediting. String cheese is currently only offered to the high school students, therefore be sure to include this information in the instructions so that it is clear which students are to be offered the string cheese.
- Crispy chicken salad - identify age/grade groups, update crediting, add grain.
- Bag lunch recipe and order form - identify age/grade groups, update crediting, update order form to align with recipe.
- Chicken and gravy - identify age/grade groups, add grain.
- Tater tot casserole - identify age/grade groups.

*Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.*

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### Technical Assistance (TA)/Compliance Reminders

###### Annual Financial Report (AFR)

Equipment, purchased services, and other shared expenses must have a portion allocated to Non-program foods.

###### Unpaid Meal Charges

**Q12. After a student graduates or leaves the district, if there are funds remaining in a student's meal account, can a SFA establish a dollar amount (e.g., anything under \$10.00) that the SFA will not attempt to refund?**

A. No. When *any* student leaves the district or graduates, SFAs must attempt to contact the student's household to return *any* funds remaining in the account. Currently, there is no approved flexibility to simply set a dollar threshold (e.g., \$10.00), SFAs can transfer remaining funds in a student's meal account to a sibling in the same household who remains in the district. SNT encourages SFAs to develop policy language which clearly explains how households will be contacted to issue refunds (e.g., via email, phone, mail), the number of times (e.g., three attempts) before the SFA will no longer attempt to issue a refund, and that the school will report the funds as "[unclaimed property](#)".  
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>).

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

The agency is in compliance.

###### Paid Lunch Equity (PLE)

The agency utilized the 18-19 SY flexibility.

###### Revenue from Non-program Foods

The agency is in compliance.

### 4. GENERAL PROGRAM COMPLIANCE

#### Civil Rights

##### Technical Assistance (TA)/Compliance Reminders

###### Civil Rights Training

Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

###### Civil Rights Self-Compliance Form

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

## Special Dietary Needs

- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- 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.

## Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- 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. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints ([https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)).

## Finding and Corrective Action Needed: Civil Rights

- Finding:** The Confirming Official/Director of Business and Finance did not complete Civil Rights Training. This must be conducted annually.

**Corrective Action Required:** Review the [School Nutrition Civil Rights Training PowerPoint](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>). Sign off on an attendance record and/or submit the date of completion via email to the consultant. Retain records of completion and count the time towards annual Professional Standards hours.

## On-site Monitoring

The agency is in compliance.

## Local Wellness Policy

### 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 begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

### Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>).

Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, checklist, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

### **Findings and Corrective Action Needed: Local Wellness Policy**

**Finding:** SFA LWP meets some but not all requirements as stipulated above.

**Corrective Action Required:** Please provide a timeline for updating your policy to become compliant with the final rule. The current policy is missing language related to:

- Food and Beverage Marketing;
- Foods *sold* to students on the school campus during the school day (Smart Snacks) and;
- Foods provided, but *not sold*

### **Smart Snacks in Schools**

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

At the time of the on-site review there were no competitive foods or beverages sold at New Horizons. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

### **Findings and Corrective Action Needed: Smart Snacks**

None.

### **Professional Standards**

#### **Technical Assistance (TA)/Compliance Reminders**

##### Professional Standards: Training Requirements

SFAs should clearly document all required training information and maintain that file including: the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

## Water

Consider providing a pitcher with cups for lunch at New Horizons. There is a drinking fountain adjacent to the meal service area, but a pitcher with cups would be more convenient for staff and students.

## Food Safety and Storage

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

#### Food Safety Inspections

Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

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

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

#### Time as Public Health Control

When using "Time as a Public Health Control:"

- The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
- Cold TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan. Thus, if any TCS food is held without temperature control during service, including TCS foods on garden bars and milk, all leftover TCS food must be discarded.**

#### Findings and Corrective Action: Food Safety

❑ **Finding #1:** New Horizons is not following the Time as a Public Health Control SOP. Milk is not under temperature control during service and is returned to the walk-in cooler at the end of service.

**Corrective Action Needed:** Submit a statement explaining how the process or SOP will be corrected. If desired, work with your local sanitarian to approve the re-service of milk, which will require monitoring milk temperatures on a log to ensure it is below 41 degrees.

❑ **Finding #2:** Most recent food safety inspection report is not posted in a publicly visible location at New Horizons.

**Corrective Action Needed:** Post most recent food safety inspection report in location visible to public. Submit photo as an attachment to assigned DPI Nutrition Program Consultant via email.

### **Buy American**

The food service director maintains a spreadsheet where they track all non-compliant products as they are received. *Thank you and keep up the good work!*

### **Findings and Corrective Action Needed: Buy American Provision**

None.

### **Reporting and Recordkeeping**

Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

### **School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach**

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

#### **Breakfast Promotion**

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](#) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

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.

- School Breakfast is promoted in the Back-to-School newsletter and posting of monthly menus. A second chance breakfast is offered at the High School.

#### **Summer Meals**

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Winneconne Community School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)

- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

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

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

❑ **Finding #1:** The agency did not conduct SFSP outreach in the 17-18 SY.

**Corrective Action Needed:** Submit a statement to the consultant outlining what the SFA will do in the 18-19 SY to inform households of where they can find a free meal over the summer months.

**5. OTHER FEDERAL PROGRAMS REVIEWS**

**Wisconsin School Day Milk Program (WSDMP)**

**Technical Assistance (TA)/Compliance Reminders**

- The reimbursable fluid milk substitute for the WSDMP is juice. This differs from the federal milk and meal programs.
- Milk served and claimed for the WSDMP must be "Wisconsin produced", meaning that all or part of the raw milk used by the milk processor was produced in Wisconsin. Maintain records from your current milk supplier to support this requirement.
- There is an underclaim for the 17-18 SY. The SFA claimed only free student milks. Reduced student milks can also be claimed in the free category. The 17-18 SY claim can no longer be amended. Moving forward, ensure the reduced milks are claimed in the free category for the 18-19 SY claim due August 31, 2019.

**Findings and Corrective Action: Wisconsin School Day Milk Program**

✓ **Finding:** The PI 1464 paper contract is outdated and does not accurately reflect the current operation of the WSDMP at Winneconne Community School District.


**Corrective Action Required:** Submit an updated paper contract to the consultant.

**Corrected. No further action required.**

"The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

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



**Every Child a Graduate**  
College and Career Ready

*With School Nutrition Programs!*