

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

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**School Food Authority:** Wisconsin Health Services

**Agency Code:** #759113

**School(s) Reviewed:** Winnebago Mental Health

**Review Date(s):** April 4-5, 2018

**Date of Exit Conference:** April 5, 2018

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, 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).
- 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 Afterschool Snack Program is available to schools that offer enrichment activities to students at the end of the school day. Schools can participate as an "area eligible" afterschool snack program if it is located at a school or in the attendance area of a school where at least 50 percent of the enrolled children are eligible for free or reduced price meals. In an Area Eligible Afterschool Snack Program, all participating students are claimed in the free eligibility category when a reimbursable snack is selected.

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to facility staff 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 for their willingness to make changes to meet school nutrition program regulations.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT MEAL PATTERN AND NUTRITIONAL QUALITY

#### Edit Check

- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission. The edit check must be based on the highest number of students eligible for meal benefits and assessed each month for accuracy prior to submitting the monthly Reimbursement claims.

**Finding:** The edit check document showed several days during the review month where the number of meals claimed for reimbursement exceeded the number of students recorded by the facility census.

Assessment of the error found that the issue was the result of inaccurate census reporting rather than an error in meal counts. The SFA experiences a high number of admissions and discharges on any given day with census taken and recorded daily at midnight. This census doesn't reflect admissions or discharges that occur prior to the day's breakfast or lunch and as a result the meal counts often exceed the number of students eligible by census. Keep in mind that SFAs may use the highest census count for the month when conducting an edit check but need to take into consideration the actual census against meals served on a daily basis as part of the monitoring process.

**Corrective Action Needed:** Please submit a detailed statement indicating how the SFA will adjust the edit check system to reflect accurate counts based on accurate census data. In addition submit an edit check document for one month along with supporting documentation prior to submission of the April 208 meal claims. This error does not result in fiscal action as meal counts were verified for the month of review when actual attendance records were reviewed during the onsite visit.

### 2. RESOURCE MANAGEMENT

#### Annual Financial Report

- 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 which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- 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.
- Indirect costs may not be assessed to the school foodservice fund in Wisconsin. All costs must be specific and measurable, such as a separate meter for electricity, actual usage for printing, and/or specific measured time studies for trash removal.

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

**Finding:** Indirect costs were assessed to the school nutrition program on the annual financial report.

**Corrective Action Needed:** Please resubmit your 16-17 Annual Financial Report with revenues and expenses broken out by program and category and indirect costs removed. To do this, you will need to contact Jacque Jordee at [Jacqueline.jordee@dpi.wi.gov](mailto:Jacqueline.jordee@dpi.wi.gov) or 608-267-9134 and fax or email her an updated report to complete a manual update with a CC to Loriann, [loriann.knapton@dpi.wi.gov](mailto:loriann.knapton@dpi.wi.gov) .

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

#### **Commendations**

We extend sincere appreciation to the FSD for her extreme flexibility and patience while planning the logistics of this review around the weather. Her organization, communication, and prompt action is greatly appreciated. Her dedication to the nutrition program is very evident. We also want to thank the cafeteria manager, diet technician, and other nutrition professionals for the time they spent with us answering questions. Meals served to students are appealing and all entrees are kept hot prior to service. We commend your efforts to provide students with fresh produce and fresh homemade WGR bakery items. Thank you for encouraging healthy habits and offering a variation of options. Keep up the great work!

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

**Training:** Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [training webpage](https://dpi.wi.gov/school-nutrition/training) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer in Green Bay, Wausau, Rice Lake, Madison and Milwaukee. An RCCI training is scheduled for July 23-24 in Madison. There will be emails sent in the coming months regarding the trainings available at these locations. You may also check back on the [School Nutrition Team Training](https://dpi.wi.gov/school-nutrition/training) webpage (https://dpi.wi.gov/school-nutrition/training). Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (dpi.wi.gov/school-nutrition/directory).

**Salad Portions:** Fruits and vegetables credit by volume, not weight. Raw, uncooked leafy greens credit for half the volume served in their fresh forms. For this reason, it is recommended to plan serving sizes for salad or lettuce in volume (ex, cups) as opposed to weight (ex, oz).

**Crediting:** Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. An updated [Brakebush Chicken Nuggets PFS](https://brakebushbg.specpage.com/Search/Product?productId=460203) is available with M/MA and Grain statements (<https://brakebushbg.specpage.com/Search/Product?productId=460203>).

**Holiday Meals:** SFAs (including RCCIs) need to follow the appropriate meal pattern(s) per age/grade group when serving a special holiday meal. If planned correctly, holiday meals can meet the daily and weekly meal pattern requirements. Because nutrient analyses are based on a weighted weekly average, some days may exceed calories, sodium, and saturated fat while others may be lower in these dietary specifications. A special holiday meal may be a day where these are exceeded as long as the weekly dietary specifications are met. Another option is to serve holiday meals at supper time, like in an RCCI, so that National School Lunch Program (NSLP) requirements do not need to be followed. If serving a holiday meal during lunch, keep in mind that all weekly minimums need to be met, including vegetable subgroups.

**Signage:** USDA NSLP reimbursable meal signage was not posted at breakfast or lunch to show students what constitutes a reimbursable meal. However, MyPlate signage was posted in the cafeteria, which is a reasonable and practical alternative for teaching nutrition education to students who are unable to practice Offer versus Serve. It may be beneficial still to consider adding USDA reimbursable meal signage to the unit floors and in the cafeteria. If you are interested in ordering signage from SNT, please visit the [Team Nutrition](http://dpi.wi.gov/team-nutrition) webpage ([dpi.wi.gov/team-nutrition](http://dpi.wi.gov/team-nutrition)) and complete the Resource Order Form.

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

**Finding: Outdated/incorrect recipes lead to daily and weekly vegetable and M/MA shortages, as well as a weekly vegetable subgroup shortage** *\*\*Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*

#### M/MA

- Cheese sandwiches with 2 slices of cheese credit as 1.50 oz eq M/MA. This results in daily ( $\geq 2$  oz eq) and weekly ( $\geq 14$  oz eq) M/MA shortage at lunch during week of review. Cheese sandwich recipe updated to offer 3 slices of cheese (2.25 oz eq) prior to service. *Corrected onsite, no further action required.*
- 2/3 cup stroganoff credits as 1.75 oz eq M/MA. This results in daily ( $\geq 2$  oz eq) during day of review. Stroganoff recipe updated to offer 1 cup (2.25 oz eq) prior to service on day of review. Alternatively, the recipe could be updated to provide more M/MA per 2/3 cup (ex, add cottage cheese back in place of sour cream, or add more beef).

#### Vegetables

- On Monday 1/2 cup corn (1/2 cup starchy vegetable) and 2 oz Popeye salad (1/4 other vegetable) was served. A total of 3/4 cup vegetables were offered this day. Students must be offered 1 cup of vegetables each day.
- On Thursday 1 cup of tomato soup (5/8 cup red/orange vegetable) and 2 oz tossed lettuce and spinach salad ( 1/8 cup dark green and 1/8 cup other vegetables) was served. A total of 7/8 cup vegetables were offered this day. Students must be offered 1 cup of vegetables each day.

#### Vegetable Subgroup

- Only 1/8 cup of dark green vegetables is served during the week of review (1/8 cup spinach on Thursday). Students must be offered ½ cup dark green vegetables each week.

Continue to work towards updating all standardized recipes. Visit our [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>) or [contact a Public Health Nutritionist](https://dpi.wi.gov/school-nutrition/directory) for assistance (<https://dpi.wi.gov/school-nutrition/directory>).

**Corrective Action Needed:** *M/MA shortages were corrected prior to service on the day of review. 100% of meals on the day(s) of review were reimbursable. Component shortages existed during the week of review. While it is important to update all recipes to verify crediting, please submit updated and corrected versions of these recipes from the week and days of review:*

- Salisbury steak (recipe and meal pattern contribution worksheet does not match)
- Homemade WGR bread (could credit as 1.25 oz eq grain per slice)
- Beef stroganoff
- Pancakes (all varieties)
- Tossed salad with spinach (incorrect subgroup and creditable volumes)
- Popeye salad (incorrect subgroup and creditable volumes)
- Chopped lettuce (served with taco meal)

Please also submit one completed [7-day meal planning worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-9-12-7-day.docx) for the menu at WMHI-YSU from the week of review (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-9-12-7-day.docx>). Refer to [vegetable sub-group listing](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table-7-day.pdf) and [meal pattern requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table-7-day.pdf) for assistance (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern-table-7-day.pdf>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>).

*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.*

## **SMART SNACKS**

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

At the time of the on-site review there were no competitive foods or beverages sold. 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.

## **BUY AMERICAN**

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

Thank you for tracking Non-Compliant Buy-American products. By closely monitoring the country of origin for all incoming products for 2-3 months, many products can be identified and recorded. After identifying those products, monitor substitutions, new products, special orders, and produce that may change origins with seasonality. Record and update as needed.

There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
  - a. Months of seasonality (ex, cucumbers from Mexico seasonally November-March)

- b. Specific date (ex, one-time substitution from vendor on date)
  - c. Date of update/review (tracking template updated on date)
- 2. Name of product
- 3. Country of origin (country [ex, Argentina], NOT continent [ex, South America])
- 4. Reason
  - a. Cost analysis
  - b. Seasonality- record the months that the domestic product is not available
  - c. Availability
  - d. Substitution- record the reason the distributor substituted the product
  - e. Distribution- record the reason the distributor carries the non-domestic product
  - f. Other- explain

You may record additional information if you find it beneficial.

A suggested template is found on the [Buy American](#) webpage under Buy American Noncompliant Product list (word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

#### 4. GENERAL

##### Technical Assistance Afterschool Snack Program

- Winnebago Health Services provides an afterschool “community group” on resident floors each day. This group meets the criteria for an afterschool enrichment activity which would make the site eligible for participation in the [Afterschool Snack Program](#) (<https://dpi.wi.gov/school-nutrition/after-school>). Please consider participating in this program to enhance student nutrition after the school day.

##### Food Safety

###### 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 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.

**Finding:** Most recent food safety inspection report is not posted in a publicly visible location.

**Corrective Action Needed:** Post most recent food safety inspection report in location visible to public.

- Completed on-site. No further action required.

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](http://dpi.wi.gov/statesupt/agenda-2017)).



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