

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

School Food Authority: North Crawford School District

Agency Code: #12-2016

School(s) Reviewed: North Crawford Elementary School

Review Date(s): March 7-8, 2018

Date of Exit Conference: March 9, 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:

- 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 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 school nutrition staff at the North Crawford 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Comments/Technical Assistance (TA)/Compliance Reminders

Free and Reduced Meal Applications

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

Verification

- 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.

Please note The SFA did an overall excellent job of conducting the verification process. The verifying official should be commended for her conscientious attention to ensuring the verification process was completed accurately and in a timely manner.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of North Crawford Elementary School. We appreciate your time and efforts spent preparing for and participating in the onsite review. The cafeteria was inviting – colorful and clean. Signage was posted outside each kitchen door, listing menu items by component and educating children how to select reimbursable meals. School nutrition professionals batch cooked entrees and sides. Meals looked and tasted delicious. Garden salad was portioned into bowls to ensure planned serving sizes and minimize food waste. The school nutrition professionals work seamlessly as a team. They care deeply about the child nutrition programs and for the students they serve. You all were a pleasure to work with. Please do not hesitate to contact me with questions or concerns.

Technical Assistance and Program Requirement Reminders

Non-reimbursable Meals

One student at North Crawford Elementary School selected a non-reimbursable meal during lunch meal observation on March 7. The student's meal contained one hot dog, one hot dog bun, 1/4 cup of baked beans, and 1 cup of milk. Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.

Weight versus Volume

Use cup volume amounts when recording portion sizes on the production records for fruits and vegetables. Fruit sizes (e.g. case count) should also be recorded. This is the easiest way to ensure the meal pattern requirements are met. Weight and volume may not be used interchangeably for crediting purposes. A [portion control webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#pc) (<https://dpi.wi.gov/school-nutrition/training/webcasts#pc>), which describes portion control techniques and explains the difference between weight and volume, is available from the School Nutrition Team (SNT). Earn fifteen minutes of continuing education credit by viewing the webcast.

Meat/Meat Alternate at Breakfast

There is no requirement to offer meat/meat alternate (m/ma) at breakfast. Therefore, there are no daily or weekly minimums or maximums. Menu planners have the discretion to credit m/ma items as “grain” or “extra” foods. School food authorities must still serve the 1 ounce equivalent (oz eq) daily minimum requirement of a true grain. M/ma as a “grain” counts towards weekly grain requirements, counts as an item under Offer versus Serve (OVS), and is included in dietary specifications (e.g. calories, sodium, saturated fat, trans fat).

Production Records

The breakfast and lunch production record templates currently in use are missing required information, such as recipe name/reference number or product name/description and planned number of portions. While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements (“Must Haves and Nice to Haves” list) can also be found at that link.

Planned portion sizes are required for every meal component and condiments. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Please refer to the [Production Record Requirement list](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) found on our [Production Records](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>).

Retain records for three years plus the current school year. Per the food service director, a disgruntled former employee destroyed records from prior school years.

Product Formulation Statements

Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current CN label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients, based on entries in the *Food Buying Guide*; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson). Please note that product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

Condiments

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. The first sodium targets remain in effect. Promote correct serving sizes by adding signage at the condiment station with a photo of what one tablespoon looks like, purchasing single-use portion cups to aid in portion control, or using signage on self-serve pumps or squeeze

bottles. More information on sodium targets is found on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) under the Sodium heading.

Child and Adult Care Food Program (CACFP)

Pre-kindergarten students must be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service. Students may be offered a choice within components (e.g. baked beans, potatoes, garden salad) as long as the total meets the daily minimum requirements.

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. The Lucky Charms, Cinnamon Toast Crunch, and 25% Less Sugar Cocoa Puffs cereals were above the sugar limit for the serving size. To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements. For more information, including the sugar limit charts, calculation examples, and cereals that meet the sugar requirements, please refer to the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is thought of as a dessert or treat. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf).

A meat/meat alternate may be used to meet the entire grains requirement up to three times per week at breakfast. You may continue to serve a meat/meat alternate at breakfast, but it may only replace the entire grains component up to three times per week. Beyond that, a meat/meat alternate may be served in addition to the full grains component and should be counted as an extra food during those meals.

Addressing Hunger

According to [The School Day Just Got Healthier Fact Sheet: Calories in School Meals](https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf) (https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf), there are not specific maximums on fruits or vegetables. Schools may allow greater amounts than the required minimums by offering self-service or allowing seconds servings of these components. Additional offerings do count towards the weekly calories limits, but because fruits and vegetables are generally lower in calories, they can be excellent sources for satisfying meals and sustained energy.

USDA policy memorandum [SP 41-2014](https://fns-prod.azureedge.net/sites/default/files/cn/SP41-2014os.pdf) (https://fns-prod.azureedge.net/sites/default/files/cn/SP41-2014os.pdf) also states that with time limited lunch periods and the increased amount of fruits and vegetables offered as part of the meals, some students may be inclined to save some items for consumption at a later time. There is no federal prohibition of this practice, and Food and Nutrition Services (FNS) encourages it as a means of reducing potential food waste and encouraging consumption of healthy school meals. For food safety reasons, this practice should be limited to only food items that do not require cooling or heating, such whole fruit, cereal, packaged crackers, et cetera.

Milk Types

The only allowable milk types in Child Nutrition Programs are nonfat (skim) unflavored milk, nonfat (skim) flavored milk (e.g., chocolate), and low-fat (1%) unflavored milk. Neither 1% flavored nor 2% flavored or unflavored milk can be served unless your SFA has applied and been approved for a milk exemption for school year 2017-2018. Please correct Condiment Usage Records, which inaccurately list "Chocolate Low Fat." Chocolate skim milk is served.

Training Recommendation

Anyone involved with the USDA Child Nutrition Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times during the school year. 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 and meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training webpage](https://dpi.wi.gov/school-nutrition/training#up) (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 [Webcast webpage](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)/Compliance Reminders

Non Program Foods

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- 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.
- Just a reminder to assess all foods, including reimbursable meals foods against the non program food cost to ensure the integrity of the nonprogram foods tool.

4. GENERAL PROGRAM COMPLIANCE

Local Wellness Policy

The school wellness policy is due for update in 2018. In reviewing the policy it was difficult to assess if all of the policy initiatives had been met as outlined in the 2015 policy. The district website indicates that the wellness policy and annual progress reports will be made available on the district website. The current website includes the wellness policy but no progress reports. The district is reminded to follow up with initiatives outlined in the policy when the 2018 triennial assessment and update is developed.

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. It is a reminder that once the school wellness policy is adopted by the school district that the directives set forth in the policy be upheld and practiced throughout the school environment.

At a minimum, SFAs must permit participation by the public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Content of the Wellness Policy

At a minimum, the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.
- An assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Required

Certification and Benefit Issuance

Finding #1: One Application was determined as free but should have received reduced priced meals based on income. One Application was determined as free eligible but should have been denied based on reported income.

Corrective Action Needed: The applications were corrected during the onsite review. Letters were sent to households advising them of the error. Benefits for all students listed on each application were updated with new benefits starting 10 operating days after the date of the notification letter. No further Corrective Action is required. The errors will not be subject to fiscal action because the total error rate for this area fell below the 3% error rate allowed by USDA.

Verification

Finding #2 Confirmation reviews of applications selected for verification were completed after the verification process was completed. USDA guidance confirmation reviews must be completed prior to sending the documentation.

Corrective Action Needed: Please submit a statement indicating the intent of the North Crawford School District to have the confirming official review applications for accuracy prior to sending them out for verification. Additional guidance on nonprogram foods is found under the technical assistance section of this report.

Non Program Foods

Finding #3 The Non Program Foods Tool was not completed for school year 2017-2018.

Corrective Action Needed: Submit a copy of a completed tool using a 5 day reference period. The [nonprogram foods revenue tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) is available on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>). Additional guidance on nonprogram foods is found under the technical assistance section of this report.

MEAL PATTERN MEAL PATTERN AND NUTRITIONAL QUALITY

Meal Pattern

Finding #1: The weekly minimum requirement for grain was not met for breakfast during the review period as a result of assorted cereal bowlpaks offered daily without an additional grain or m/ma food item. Cereal credited as 1.0 oz. eq of grain, resulting in a 3.0 ounce equivalent weekly shortage of grain.

Required Corrective Action: Please submit a statement describing how you will meet the weekly minimum requirement going forward. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Finding #2: The breakfast and lunch production record templates currently in use are missing required information, such as recipe name/reference number or product name/description and planned number of portions.

Required Corrective Action: Please submit updated breakfast and lunch production record templates which include the missing required information.

Smart Snacks

If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to K-12th graders, beverages must meet Smart Snacks standards for the K-5 age/grade

group; therefore, items like caffeinated, low-calorie (≤ 5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (< 5 kcal/8 fluid oz; ≤ 10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable. Brisk Lemonade (9 kcal/fluid oz.) and Brisk Lemon Iced Tea (6.5 kcal/fluid oz.) sold in beverage vending machines are non-compliant with Smart Snacks beverage standards for all students, including high school students.

Finding #3: Flavored waters (e.g. Vita Ice, Aquafina Flavorsplash), Brisk Lemonade, and Brisk Lemon Iced Tea sold in beverage vending machines are non-compliant with Smart Snacks beverage standards, as described above. Additionally, the Gatorade vending machine is locked until 4:00 PM, while the school day ends at 3:35 PM.

Required Corrective Action: Submit a statement describing specific actions which will bring beverage vending machines into compliance. Consider replacing non-compliant products or locking specific machine rows. Sales of non-compliant beverages may not begin until 30 minutes after the end of the instructional school day (i.e. 4:05 PM).

Buy American

Finding #4: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Canned pineapple from Indonesia
- Canned black olives from Spain
- Frozen broccoli from Mexico

Required Corrective Action: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A template form is located on the [Procurement webpage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>). **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).



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