

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

School Food Authority: DeForest School District

Agency Code: 131316

School(s) Reviewed: Yahara and Windsor Elementary Schools

Review Date(s): May 22-23, 2018

Date of Exit Conference: May 23, 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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at DeForest Area School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance, although they are all incredibly knowledgeable. In addition, thank you so much for the tremendous and very thorough work put into the off-site materials. The DPI review team appreciates the eagerness of the staff at DeForest Area School District for their willingness to make changes to meet USDA School Meals Program regulations.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

All applications were approved and denied appropriately, and therefore, there were no application errors. Really great work!

Technical Assistance:

- Total incomes on application are to only be annualized if multiple incomes are listed on the application with multiple frequencies (monthly, bi-weekly, etc.). If multiple incomes are listed, and all are within the same frequency, the total income should be reported as that frequency, and not annually.

Verification

Commendations:

All applications selected for Verification were verified correctly by November 15, and all applications were selected from the October 1 pool of applications. The Verification Collection Report was completed prior to February 1 and the Standard Sampling Method was correctly used. Thank you!

Meal Counting and Claiming

Commendations:

The review team is confident in the meal counting and point of service process at Yahara and Windsor Elementary Schools. All counts and claims from the review period and for the day of review for lunch and breakfast were appropriate.

Findings and Corrective Action Needed: Meal Counting and Claiming

Finding #1: The review team observed one non-reimbursable meal at Yahara Elementary School's lunch service. Fiscal action will be calculated with a \$600 disregard.

Corrective Action Needed: Please provide a statement explaining how this issue will be avoided in the future to the consultant assigned to your review.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all of the school food service professionals in the DeForest Area School District. We thoroughly appreciate your time and efforts not only in preparing for this review, but also in all that you do to ensure the students have tasty and nutritious meals every day. All of the food service staff and administrative staff were very welcoming and helpful while we were on-site. We appreciate your availability during the on-site portion of the review.

Thank you to the FSD for timely communication and excellent documentation. The FSD's cooperation and efforts greatly improved the efficiency and efficacy of the review process, which is always thoroughly appreciated.

USDA Certification of Compliance Worksheets showed that reimbursable meals are being served during the week of review - no errors were flagged. All food components had correct documentation. Standardized recipes and menus are completed correctly. Menus are thorough, appealing, and contain all necessary statements. Keep up the great work, DeForest Area School District!

Lunch service on the day of review went smoothly, with only 1 non-reimbursable meal identified between both Windsor and Yahara Elementaries. Meals were colorful and appealing.

The cafeterias at both Yahara and Windsor are very appealing and kept clean between each meal service. The colorful posters provide excellent nutrition education. We appreciated seeing the large hand washing sink to promote food safety and cleanliness.

Comments/Technical Assistance/Compliance Reminders

CACFP: The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. Pre-kindergarten is exempt from the CACFP meal pattern *if* they are comingled with older students following the National School Lunch Program; *meaning that pre-k students can follow the NSLP meal pattern if they are served at the same time as older students and without distinction.* More information regarding the updated CACFP meal pattern is available on 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>). Contact Erin Opgenorth (erin.opgenorth@dpi.wi.gov) or Tanya Kirtz (tanya.kirtz@dpi.wi.gov) with any questions.

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).

Production Records: Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. DASD Production Records templates include numerous products and information, particularly at breakfast. Continue to work with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Yahara Breakfast

Production records were lacking milk usage data for the entire week of review. Milk is a required component as part of the School Breakfast Program and daily usage must be recorded on production records. *TA provided prior to on-site review, improvements noted upon on-site inspection.*

Update and maintain Breakfast Production Record Templates which reflect all of the items currently served, including all of the pre-packaged breakfast kits and packaged bars available to students. These templates should be updated when new products are added or existing products are phased out of service. *Verbal commitment from FSD to update Production Records to include all items available to students.*

Storing and Maintaining Updated Crediting Documentation: Food used in the Child Nutrition Programs must have proper crediting documentation available. Sources of this information are the USDA Food Buying Guide, Child Nutrition (CN) labels, and product formulation statements (PFS). CN labels and PFS are required for food purchased in processed form. The Product Information Sheet for Darlington Appleways Bar served at breakfast lacks the appropriate Product Formulation Information needed to credit this item without further information. PFS presented prior to close of review.

Portion Control: Using volume measures (such as ½ cup) to record portion sizes of fruits and vegetables and using weight measurements (such as ounces) to record portion sizes of meat/meat alternates and grains.

Substitution: If it is necessary to write-in a substitute menu item on the production record, ensure that this item is documented appropriately. For example, on 4/24/28 the Windsor Breakfast Production Records, 1-oz grain equivalent cereal bars are crossed out and “raisins” were written into that section. While it is commendable that the kitchen staff is making the extra effort to account for any substitutions or replacements, raisins are a fruit and are not an appropriate substitution for a grain product. Upon review, raisins were not substituted for a grain and no grain shortage existed; the raisins were mislabeled on the production records and were only served as a fruit substitute. Whenever a substitution is made, the substituted item should be recorded either on a completely new line or in the place of the item no longer being served.

Crunchmania: Currently, the Kellogg’s Crunchmania Cinnamon Bun is being offered with and recorded as a 1-oz grain equivalent on Breakfast Production Records. This product credits as a 2-oz grain equivalent based on its Product Formulation Statement. Adjust Breakfast Production Records accordingly. Additionally, given the grade group served, offering a 2-oz equivalent grain in addition to the 1-oz whole grain cereal results in maximum 3 oz eq grain daily and 15 oz eq grain weekly. Although USDA is not enforcing maximum limits at this time, please do be aware of this product’s crediting in combination with other grain items.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

□ Finding #2: Signage

It is required to post lunch signage that lists the five components and informs students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination of fruit and vegetable. The “½ cup” statement was written on one sign in the Yahara cafeteria, but not the second sign.

Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-signage-resources) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-

planning/signage).

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) and complete the Resource Order Form.

Corrective Action Needed for Finding #2: *Kitchen manager corrected on site; no further action required.*

☐ Finding #3: Offer Versus Serve

One meal was non-reimbursable. The student selected:

- 1 hot dog (2 oz eq M/MA)
- ½ cup green beans (½ cup vegetables)
- ½ cup carrots (½ cup vegetables)

A reimbursable meal must have at least

1. 3 different components
2. ½ cup fruit and/or vegetable
3. 3 full components

Corrective Action Needed for Finding #3: Submit a written statement explaining how non-reimbursable meals served under OVS will be avoided in the future. An option is to conduct OVS training for all food service staff, such as the [OVS webinar](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations:

The foodservice director does a great job managing the school foodservice account and the account ended in a positive fund balance. The SFA had an Unpaid Meal Charge policy in place by the July 1, 2017 deadline. No indirect or unallowable costs were observed during the onsite review.

Compliance Reminders:

Unpaid Meal Charges:

- As of July 1, 2017, all SFAs operating the NSLP and/or SBP must have in place a written local meal charge policy to address situations when children participating at the reduced price or paid rate do not have funds to pay for their meal at the time of the meal service. The policy must be communicated to all households with children attending the SFA and all school or SFA-level staff members responsible for the local meal charge policy's enforcement.

Paid Lunch Equity (PLE)

Commendations:

The PLE tool was completed correctly.

Compliance Reminders:

- **ALL Pricing SFAs must complete the [Paid Lunch Equity Survey](https://goo.gl/forms/m3YAS34LPQreq5Ei1) by May 31** (https://goo.gl/forms/m3YAS34LPQreq5Ei1).

- Any SFA with a **positive or zero balance** in its nonprofit school food service account as of January 31, 2018, is exempt from PLE requirements found at 7 CFR 210.14(e) for school year (SY) 2018-19. For these SFAs, **completion of the survey** is the record DPI needs to exempt your SFA from completing the PLE Tool.
- Any pricing SFA with a **negative balance** in the nonprofit school food service account as of January 31, 2018, **must complete the survey and the PLE tool** for the SY 2018-19 to establish prices for paid lunches for SY 2018-19. The PLE tool must then be uploaded to the 2018-2019 contract.

Revenue from Non-program Foods

As the SFA sells non-program foods, a comprehensive review in this area was completed. No further action is required.

Commendations:

All non-program foods are properly allocated within the Annual Financial Report (AFR). The non-program foods revenue tool was also completed, and it is apparent that the expenses of non-program foods are covered by their costs.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

The annual Public Release and Civil Rights Compliance Self-Evaluation (PI-1441) form were both completed by October 31. A civil rights complaint policy is also in place and the "And Justice For All" poster was hanging in a publicly visible location. All students with special dietary needs have a signed medical statement on file. Thank you!

Technical Assistance:

Special Dietary Needs

- Going forward, please utilize the most current [DPI medical statement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf) for Special Dietary Needs (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>). This form contains the most updated non-discrimination statement and a location to indicate the title of the medical practitioner signing the statement.
- Only medical professionals who are authorized to write prescriptions may sign this Special Dietary Needs medical statement.
- The review team encourages an increase in communication between nutrition staff and health coordinators within the SFA when establishing Individualized Education Plans for specific students.

Compliance Reminders:

- The review team would like to make note that, per new regulations within the [Permanent Agreement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/permanent-agreement.pdf), when a complaint is submitted to the SFA, the SFA has five days to report the complaint to USDA (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/permanent-agreement.pdf>).

Findings and Corrective Action Needed: Civil Rights

❑ Finding #4: The lunch menus, LWP, the Unpaid Meal Charge policy, the Discrimination policy, and various additional household letters do not have the non-discrimination statement.

Corrective Action Needed: Please send along these revised documents to the consultant assigned to your review.

❑ Finding #5: Five nutrition employees did not complete the annually required civil rights training.

Corrective Action Needed: Please have these employees complete the training and send the sign-off form to the consultant assigned to your review.

On-site Monitoring

Commendations:

All required onsite monitoring forms were completed. Thank you!

Compliance Reminders:

- Per regulations, each school year, all sites operating NSLP must complete the on-site NSLP monitoring form. Additionally, only half of the sites operating SBP must complete the on-site SBP monitoring form.

Local Wellness Policy (LWP)

Commendations:

The SFA's LWP contained all required areas. Thank you!

Smart Snacks in Schools

Comments/Technical Assistance/Compliance Reminders

Only 8 fl oz of fat free, fat free flavored, and 1% milks was offered a la carte at lunch. Only 4 fl oz of 100% juice was offered a la carte at breakfast. These are Smart Snack compliant items. If any other 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. More information on healthy fundraisers can be found 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>).

Fundraisers compliance reminder: Currently, DASD does not hold food-related fundraisers in at the elementary level; however, should DASD hold food-related fundraisers at the elementary level in the future or elsewhere in the district, please note the following DPI regulations:

- Each student organization may have 2 fundraisers per school year where they sell items non-compliant with Smart Snacks, also known as fundraiser exemptions. These exemptions may not exceed two consecutive weeks, each.

- An exempt fundraiser may sell foods/beverages that are not Smart Snacks compliant, but these sales may not occur in the meal service area during meal times.
- Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations. Templates, such as the [Exempt Fundraiser Tracking Tool](#), are available on the Smart Snacks webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). Per SFA request, below are several resources for non-food-based fundraisers geared towards students:

Please see the DPI's [Healthy Fundraisers Flyer](#) for information on creating non-food related fundraisers (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/healthy-fundraising-ideas-flyer.pdf>).

As a reminder, any food-related sales must be communicated to the Food Service Director to ensure compliance.

Professional Standards

Commendations:

The Professional Standards tracking tool utilized by the SFA contains all required elements, and all nutrition staff have either met or are on their way to meeting all annual training requirements. Thank you!

Food Safety and Storage

Commendations:

A wonderful handwashing station is implemented and milk coolers are well-maintained at Yahara. Both Windsor and Yahara had food safety plans with all required components, all employees signed their Employee Reporting Agreements, and temperature logs were tracked appropriately. Great work!

Technical Assistance:

- Proper glove-changing procedures must be followed. Per 3-304.15 (A) If used, single-use gloves shall be used for only one task such as working with ready-to-eat-food or with raw animal food, used for no other purpose, and discarded when damaged or soiled, or when interruptions occur in the operation.
- For food safety reasons, employees are not allowed to take food home with them. Foodservice employees are allowed a free meal with each meal service, however, this meal or any extra meals, may not be taken home.
- An individual pre-packaged cereal container fell on the floor during service. This is allowed to be put back into service so long as it is wiped down with a sanitization wipe.

Resources:

- DATCP [Gloves Fact Sheet](#) (<https://datcp.wi.gov/Documents/UsingGlovesFactSheet.pdf>)
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Buy American

Comments/Technical Assistance/Compliance Reminders

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the [SNT Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

Finding #6: Non-compliant items

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:

- Garlic powder (Yahara)- USA and China
- Pineapple (Yahara)- Indonesia
- Pumpkin (Windsor)- China

Corrective Action Needed for Finding #6: Incomplete Tracking Documentation

Submit a completed tracking list with all non-domestic products currently in storage.

Finding #7: Non-compliant Product List lacking information (date)

The date of non-domestic product purchase, storage, and use is not recorded on the current tracking list. 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
2. Name of product
3. Country of origin
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.

Corrective Action Needed for Finding #7: To be verified upon completion and submission of correction action from Buy American Finding #1

Reporting and Recordkeeping

Commendations:

All records are retained on file at the SFA for the minimum three years plus the current school year.

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

Commendations:

The SFA promotes the Norski Nibbles summer feeding program in which families have access to free summer meals at nearby parks.

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](#) 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
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5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations:

The SFA has documentation to support the half pint cost of milk and annual claim counts, and the point of service (POS) counts are taken appropriately.

Technical Assistance:

- The review team is confident in the POS for WSDMP at the SFA. Many teachers utilize popsicle sticks as a way to produce accurate counts. However, if ever there is a question as to whether or not the POS is producing accurate counts, the SA encourages the SFA to simply double check that students are served a milk and/or meal, and *only then* are their names “checked off” signifying the milk and/or meal was served.
- 100% fruit juice is the only acceptable and claimable substitute for the WSDMP.

Compliance Reminders:

- Milk served and claimed through the WSDMP must be “Wisconsin-produced” meaning that all or part of the raw milk used by the milk processor is produced in Wisconsin.
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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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!