

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

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**School Food Authority: City Church Madison Inc.**

**Agency Code: 13-7003**

**School(s) Reviewed: Abundant Life Christian School**

**Review Date(s): January 29 – 30, 2018**

**Date of Exit Conference: 1/30/2018**

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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 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](http://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](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. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at City Church Madison, Inc. for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very

receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff at Abundant Life Christian School for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu signage, a great looking service line, professional standards and local wellness. We were impressed during meal service with the decorations and signs for different meal components, and a friendly attitude of the school nutrition staff when assisting students to select a reimbursable meal. The whole oranges were presliced for students, making it easier to eat. The staff knows the students well and are addressed with respect.

The DPI review team is confident that City Church Madison, Inc. will continue to improve their knowledge and operation of child nutrition programs. Thank you for attending trainings in the past and we look forward to seeing you at future DPI trainings, like the Free/Reduced Meal Benefits and Verification 8 hour class.

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Certification and Benefit Issuance**

##### **Comments/Technical Assistance (TA)**

- Forty-eight eligibility determinations were reviewed, with five student errors identified.
- The entire application packet was sent to households and the correct notification letter templates were used, including the current non-discrimination statement. This system is handled in a confidential manner.

#### **Free and Reduced Price Meal Applications**

- Applications were reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official. The benefit issuance list is updated to reflect recent changes.
- The Determining Official understands the carry-over process of meal eligibility and sent reminder to households of benefits expiring, if applicable.
- All free/reduced applications and the direct certification runs were available for review.
- Thank you for running the entire student population since the updated direct certification pull in December to include some Medicaid benefits. Remember that the "M" (free) and "Z" (reduced) codes extend benefits to others in the household.
- (TA) The Determining Official needs to sign the back of the application and post the date eligibility was approved or denied.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually). This practice was conducted correctly. Thank you.

- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

#### **Annual Income**

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

#### **Household Size Box**

- (TA) The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

#### **Incomplete Applications**

- (TA) Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

#### **Application Forms**

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

#### **Other Source Categorical**

- 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.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

#### **Public Release**

- All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need)
  - Major employers contemplating or experiencing large layoffs
  - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

## Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

## Transferring Students

- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

## Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year.
- City Church Madison, Inc. had a 10.42% certification error rate. More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA's further action.

## Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA seeks written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as testing fee waivers. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).

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

- Finding #1:** The Determining Official did not sign the back of all submitted applications, nor the date processed.  
**Corrective Action Needed:** Please submit a statement of the process which will be used in the future to assure this is completed correctly.
- Finding #2:** There were two applications with three students which did not have the last four digits of the adult's social security number (SMBE1, SMJA2, SHTR).  
**Corrective Action Needed:** Please contact the household for the information and mark the student as corrected on the SFA-1 form. Submit form to the consultant for corrective action. Fiscal action will be figured for these errors for the review period (December) and month of on-site review (January). **Corrected onsite; no further action required.**
- Finding #3:** There were two applications with two students which did not have the number of names listed to match the number of household members box (IWNM, SOAL)  
**Corrective Action Needed:** Please contact the household for the information and mark the student as corrected on the SFA-1 form. Submit form to the consultant for corrective action.

Fiscal action will be figured for these errors for the review period (December) and month of on-site review (January). **Corrected onsite; no further action required.**

## Verification

### Comments/Technical Assistance (TA)

- (TA) When the application is chosen for verification, the person designated as the Confirming Official must review the application 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.
- (TA) The Verification Tracker Form (page five of [Verification Forms](#) resource) can be a useful tool for the officials involved in conducting the verification process. The tracker lists each task in the process and provides space for recording the date each step was completed. It is highly recommend this form be used to organize and guide the verification process in the future.
- (TA) The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual. The LEA doesn’t need to verify for cause error-prone applications, unless they want to verify all of them.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

### Findings and Corrective Action Needed: Verification

- ❑ **Finding #4:** The verification process was not conducted properly: the chosen application was not in the pool as of October 1 so should not have been selected, the process was not begun until November 30 and all of the income proof documentation for all household members with listed income was not received prior to eligibility status confirmation.

**Corrective Action Needed:** Please have the two office individuals who may perform verification watch [Verification](#) and [Verification Collection Report](#) and submit the certificate of completion, along with a statement of the process to use for next school year to complete the verification process ([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>). This training time may be counted for professional standards training hours.

## Meal Counting and Claiming

### Comments/Technical Assistance (TA)

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance. The meals are checked off by the school nutrition director upon receipt of a complete meal, then entered into the software, RenWeb at a later time and the claim report is consolidated.
- (TA) When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](#) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).
- The meal counting and claim for the Review Month was conducted perfectly.
- Please note that SFAs may claim visiting students in the paid category or the individual’s category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

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

- ❑ **Finding #5:** The edit checks utilized by the SFA contain most, but not all, components required. The edit checks used do not contain the highest number of lunches expected for any serving day within each pricing category (free, reduced, paid) based on attendance factor. For example, if the highest number of students approved for free meals for a month is 36 and the attendance factor is 0.93, the highest number of free meals expected on any given serving day would be  $36 \times 0.93 = 33.48$ , or 34 students.

**Corrective Action Needed:** Please provide a copy of an updated edit check that includes the highest number of lunches expected for any serving day.

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

### **Commendations (from Public Health Nutritionist)**

Sincere appreciation to the Food Service Director for her prompt communication, thorough documentation, and her dedication to serving compliant and nutritious meals to students. Signage and meal presentation is attractive. The color-coded food group squares on the wall serve as great nutrition education to students. Food service staff at ALCS were all very friendly to students. The cafeteria environment was fun, and provided the students with a relaxed place to eat and socialize.

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

**Meal Pattern:** Rather than serving a K-5 meal pattern and a 6-8 meal pattern, it may be beneficial to simplify to a K-8 meal pattern for all K-8 students. A K-8 meal pattern makes menu planning easier for school nutrition professionals, and Offer Versus Serve is in place to minimize food waste.

**Planned Portion Sizes:** Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Salad bar offerings need to be planned for a specific amount, not a range, even though students are given the option to select the portion at the time of service. For example, the menu planned may intend for the serving size of onion to be 1/8 cup and cucumbers to be 1/4 cup. Please refer to the [Production Record Requirement list](#) 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>).

**Crediting Leafy Green Vegetables:** Raw, uncooked leafy greens credit for half the volume served in their fresh forms. For example, 1/2 cup of fresh, baby spinach credits as 1/4 cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces, even if they are not in the dark green subgroup. If leafy greens are cooked, such as steamed spinach, they credit as the actual volume served. Broccoli credits for the portion in which it is served. Example, 1/2 cup serving of broccoli credits as 1/2 cup dark green vegetable.

**Crediting M/MA:** Crediting for meat/meat alternate and grain products must always be rounded down to the nearest quarter (0.25) ounce equivalency. The tortilla chips on taco day (during week of review December 12, 2017 and day of on-site review January 30, 2018) credits as 1.5 oz eq per 1.0 oz serving. The 9-12 portion of 1.25 oz will credit as 1.875 oz eq. This figure rounds down to 1.75 oz eq, not up to 2.0 oz eq.

**Sodium:** The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined sodium limits using three targets, allowing for a gradual implementation. The first target was implemented on July 1, 2014. Products that can be major contributors of sodium include condiments,

such as Montreal Seasoning Salt and salt packets. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years. If seasoning salt continues to be offered at the condiment station, promote correct serving sizes by adding signage at the condiment station. It is discouraged to offer students salt or seasoning salts.

**OVS:** Under OVS, a student must select 1/2 cup fruit, vegetable, or combination as part of his or her reimbursable meal. Food service staff at ALCS was observed sending students back for additional fruit even when students trays already contained reimbursable meals with ½ cup fruit and/or vegetable. If a student has ½ cup F/V, there is no need to send them back for more.

**Meal Patterns in Each Service Line:** The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what line/entrée the student chooses to select. Each meal line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entree option, each entree option offered is viewed as one “line” and therefore needs to meet the daily as well as the weekly requirements.

**Grab-n-Go Lunches:** Grab-n-Go lunches are a great option to provide to students, and can be a very successful option when implemented correctly. In order to claim Grab-n-Go lunches as a reimbursable meal, they must be looked at as their own separate entrée line. Remember, if you offer Grab-n-Go lunches daily, then students have the ability to choose this option every day of the week. Therefore, Grab-n-Go lunches must meet the daily and weekly requirements for all components at each grade group.

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

##### **☐ Finding #P 1: Grain Shortage at grades 9-12 during the week of review (Dec 11-15, 2017)**

1. Students in grades 9-12 who select the PB&J Jammwich entrée on December 13, 2017 only have access to 1 oz eq grain, which is not enough to meet the 2 oz eq daily minimum for high school students. This results in a daily and weekly grain shortage for 9-12 students. Consider pairing items that are less than 2 oz eq grain with another whole-grain rich item, such as crackers, pretzels, etc.
2. The FSD had planned for students grades 9-12 to be offered 1.25 oz Tostito chips for on-site day of review. No other grains were planned to be offered. Per Tostitos PFS, 1 oz is 1.5 oz eq, so 1.25 oz chips is 1.75 oz eq grain, which results in a daily and weekly grain shortage. Prior to service, FSD increased Tostito serving size for high school to 1.4 oz, which is 2.0 oz eq. **No further action required, corrected on site.**

**\*\* Please note that there was a grain shortage found during a previous Administrative Review (AR) during the review week of January 13-17, 2014. This is a repeat violation, which may result in fiscal action during this AR (January 2018).**



**Finding:** During the review week of January 13-17, 2014 only 1 oz eq of grain was served with the sliced of turkey ham for all age/grade groups due to a grain crediting error. Each Smart Blueberry Muffin weighs 57 g. Using Group D from Exhibit A of the Food Buying Guide, 1 oz eq is equal to 55 g. On the production records, the muffin was incorrectly listed as 2 oz eq. Due to this error, the weekly and daily minimums for the 9-12 grade group was not met. Technical assistance was provided onsite.

**Corrective Action Required:** Please submit a written statement on how you will ensure each menu item offered to the 9-12 graders meets the daily minimum of 2 oz eq.

**Corrective Action Needed for Finding #P 1:** Please submit a written statement on how you will ensure each meal option offered to the 9-12 students meets the daily minimum of 2 oz eq grain.

*\* Repeat violations of minimum quantity shortages may result in fiscal action on future ARs*

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**□ Finding #P 2: Daily and Weekly Vegetable Shortage during the week of review (Dec 11-15, 2017)**

- There is a daily vegetable shortage in the grab-n-go lunch option for K-5. Students K-5 are offered ½ c vegetables, while they need to be offered a minimum of ¾ cup daily.
- There is a weekly vegetable shortage in the grab-n-go lunch option for K-5. Students K-5 are offered 2-1/2 c vegetables, while they need to be offered a minimum of 3-3/4 c weekly.
- There are missing weekly vegetable subgroups in the grab-n-go lunch option for all grades.
  - K-5 students are offered 2-1/2 c red/orange vegetables, while they additionally need to be offered ½ c dark green, ½ c beans/peas/legumes, ½ c other, and ½ c starchy vegetables over the course of a week.
    - Only ¾ c red/orange is required to be offered weekly
  - 6-8 students are offered 2-1/2 c other and 2-1/2 c red/orange vegetables, while they additionally need to be offered ½ c dark green, ½ c beans/peas/legumes, and ½ c starchy vegetables over the course of a week.
    - Only ¾ c red/orange and ½ c other vegetables are required to be offered weekly
  - 9-12 students are offered 2-1/2 c other and 2-1/2 c red/orange vegetables, while they additionally need to be offered ½ c dark green, ½ c beans/peas/legumes, and ½ c starchy vegetables over the course of a week.
    - Only 1-1/4 c red/orange and ¾ c other vegetables are required to be offered weekly

Some possible solutions include:

- Remove vegetables from the Grab-n-Go lunch and require students who select a Grab-n-Go lunch to select vegetables from the salad bar. This can help to meet the daily, weekly, and sub category requirements. Even if a student still chooses to go to the salad bar and select 1 cup carrots every day, they have been offered the daily and weekly minimum as well as vegetables from all sub-groups.
- Keep veggies in Grab-n-go as is, but additionally allow students to choose from the salad bar.
- Rotate bagged vegetable options offered in the Grab-n-Go lunch to meet sub-group weekly requirements
- Increase amount of vegetables offered for K-5 meals

**Corrective Action Needed for Finding # P2:** Please submit a written statement on how you will ensure each meal option offered to each grade group meets the daily and weekly vegetable and sub-group requirements.



*\* Repeat violations of minimum quantity shortages may result in fiscal action on future ARs*

*\*\* Please note that [USDA Certification of Compliance Worksheets](https://www.fns.usda.gov/school-meals/certification-compliance-worksheets-5-day-schedule) do not clearly reflect the missing vegetable sub-groups with the Grab-n-Go option (<https://www.fns.usda.gov/school-meals/certification-compliance-worksheets-5-day-schedule>). The workbooks assume that all vegetables entered are available to students regardless of entrée selection.*

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**❑ Finding #P 3: Weekly M/MA Shortage during the week of review (Dec 11-15, 2017)**

There is a weekly M/MA shortage in the Grab-n-Go lunch option for K-5. The Uncrustable only provides 1 oz eq of M/MA. 5 days a week times 1 oz eq = 5 oz eq, which is not  $\geq$  8 oz eq weekly requirement.

Some possible solutions include:

- Including string cheese, yogurt, or a different meat/meat alternate in Grab-n-Go lunches for students of all ages.
- Send K-5 students to the salad bar to select an additional M/MA (cheese cubes, peanut butter, etc)

**Corrective Action Needed for Finding #P 3:** Please submit a written statement on how you will ensure each meal option offered to the K-5 graders meets the weekly minimum of 8 oz eq M/MA.

*\* Repeat violations of minimum quantity shortages may result in fiscal action on future ARs*

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**❑ Finding #P 4: Standardized Recipes**

Standardized recipes are required for all menu items that have more than one ingredient, such as toasted cheese. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

**Corrective Action Needed for Finding #P 4:** Please submit standardized recipes for

- Grilled chicken 12/11
- Tacos 12/12
  - Tacos in shells for all grades
  - Tacos on chips for all grades
- Chicken patty 12/14
- Fish sandwich 12/15

### 3. RESOURCE MANAGEMENT

#### **Nonprofit School Food Service Account Comments/Technical Assistance (TA)**

- This school is in good financial standing and is compliant with the excess fund balance requirement.

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

- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.

#### **Unpaid Meal Charge Policy**

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>).
- This SFA had a current policy which was communicated to their families.

#### **Revenue from Nonprogram Foods**

#### **Comments/Technical Assistance (TA)**

- The SFA completed the non-program foods revenue tool correctly and thoroughly. The completed tool indicated that the non-program foods revenue requirements are being met. Thank you for taking the time to complete the tool in such detail.

#### **Resources**

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

### 4. GENERAL PROGRAM COMPLIANCE

#### **Civil Rights**

#### **Comments/Technical Assistance (TA)**

#### **And Justice for All Poster**

- The SFA appropriately displayed the “And Justice for All” posters in public view where the program is offered, however both the older and most current versions of the poster are posted. Please see corrective action below.

#### **Special Dietary Needs**

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical

statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)

- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- 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. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.
- (TA) There are several lunch tables designated as “nut-free zones.” It is highly recommended to change the designation of this table to something more general such as “nut aware” or “allergen aware.” Due to concerns over possible cross-contact of allergens onto this designated table, labeling it “nut-free” may foster a false sense of security when it may not truly be guaranteed as “nut-free.” Using a more general term as described above may better represent the intent of this table. Additionally, tables designated for students with allergies should be properly cleaned and sanitized with cloths specifically designated for these tables. Please note that sanitizing the tables alone may reduce the number of bacteria on the surface, but will not adequately remove allergens. A cleaning solution must be used to remove potential allergens from the surfaces. A standard operating procedure for the allergen tables should be included in the food safety plan.

#### **Findings and Corrective Action Needed: Civil Rights**

- **Finding #6:** Both the most updated and older versions of the “And Justice For All” posters were publicly displayed in the cafeteria. Only the most current version of the poster should be posted.

**Corrective Action Required:** Please remove the older version of the poster so that only the most current version is on display. **Corrected on-site; no further action required.**

#### **Local Wellness Policy**

##### **Comments/Technical Assistance (TA)**

- 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.
- At a minimum, SFAs must permit participation by the general 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.

- (TA) At next policy review, consider a more specific goal for evidence-based strategies, like Smarter Lunchroom techniques and defining committee members.

## SMART SNACKS

### Commendations (from Public Health Nutritionist)

Many thanks to the Finance/Office Manager & Admissions for detailed documentation and prompt communication regarding vending machines. Thank you for keeping thorough fundraising records.

### Comments/Technical Assistance/Compliance Reminders

- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information, such as the Alliance for a Healthier Generation [Smart Snacks Product Calculator](#) on our [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- Product formulations change frequently, so it is important that crediting documentation on file is kept up-to-date. Documentation should be reviewed and updated at least twice per year and as new products are purchased or substituted. Records should reflect only the current items offered. Please note that as of July 2016, side items are limited to 200 mg sodium or less. Products assessed with the Alliance for a Healthier Generation Smart Snacks Product Calculator prior to July 2016 may no longer be Smart Snacks compliant.

### Findings and Corrective Action Needed: Smart Snacks

**❑ Finding #P 5:** All grains offered in school meal programs are required to be whole grain-rich. Replace all enriched grain products with whole grain-rich versions. The following products are not Smart Snack compliant:

- Back to Nature Honey Graham Sticks; unbleached wheat flour

**Corrective Action Needed for Finding #P 5:** Submit whole grain-rich versions of the products listed above including nutrition facts labels. Alternatively, submit a written plan for how you will eliminate the non-WGR items above.

**❑ Finding #P 6:** 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 ( $\leq 5$  kcal/fluid oz.) flat or carbonated, or no-calorie beverages ( $< 5$  kcal/8 fluid oz;  $\leq 10$  kcal/20 fluid oz.) flat or carbonated beverages are unallowable.. The following products are not Smart Snack compliant for all grade groups at ALCS:

- Izze 8.4 fl oz; 100% juice must be 8 fl oz or less to serve to the youngest grade group, which is K-5 at ALCS
- Klarbrunn flavored water; low calorie beverages can only be offered to grades 9-12

**Corrective Action Needed for Finding #P 6:** Submit K-5 compliant versions of the products listed above including nutrition facts labels. Alternatively, submit a written plan for how you will eliminate the non-compliant items above.

## Professional Standards

### Professional Standards: New Food Service Director Hiring Requirements

#### Comments/Technical Assistance (TA)

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The SFA and director use a tracking tool to document staff training and use the flexibility of counting extra training hours over a two-year period.

#### **Professional Standards: Training Requirements**

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- It is recommended that the director attend off-site trainings as applicable to stay aware of the current trends and practices.
- **Annual Training Requirements for All Staff**  
Directors: 12 hours  
Other Staff (20 hours or more per week): 6 hours  
Part Time Staff (under 20 hours per week): 4 hours  
If hired January 1 or later, only half of the training hours are required during the first school year of employment.

## Water

#### Comments/Technical Assistance (TA)

- Water is available at no charge to students during the lunch meal service and provided from a cooler with cups for easy access.

## Food Safety, Storage and Buy American

#### Comments/Technical Assistance (TA)

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices ([www.fns.usda.gov/ofs/food-safety-flashes](http://www.fns.usda.gov/ofs/food-safety-flashes)). The [Office of Food Safety](#) website ([www.fns.usda.gov/ofs/food-safety](http://www.fns.usda.gov/ofs/food-safety)) includes food safety resources.

#### **Food Safety Inspections**

- Food safety inspection reports must be posted in public view.

#### **Food Safety Plans**

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- The standard operating procedures (SOP) in the plan were highly specific for the site and were thorough in content. Additionally, the plan included new employee orientation check-off sheets

and check-off sheets for SOP review. It is clear that training staff on proper food safety practices is a high-priority.

### **Food Employee Reporting Agreements**

- All food service employees, including substitutes, must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf). Please be sure to review the content of the agreement with food service substitutes and have the substitutes sign off to indicate understanding of the content.
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

### **Findings and Corrective Action: Food Safety**

- **Finding #7:** The most recent food safety inspection report was not posted in a publicly visible location. While it was posted in the service area of the kitchen, this area is closed off when meals are not being served so it does not constitute “publicly visible.”  
**Corrective Action Needed:** Post most recent food safety inspection report in location visible to public. **Corrected on-site; no further action required.**

### **Buy American**

- 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. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- It is expected that the following products will require an exception to Buy American provisions: pineapple, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected



distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.

- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure the product received and the 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](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) (https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) are found on the procurement webpage under Buy American.
- 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. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

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

- ❑ **Finding #8:** 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 Mandarin Oranges - China
- Canned Pineapple – Indonesia, Philippines
- Frozen Broccoli - Mexico

**Corrective Action:** The identified noncompliant food item(s) qualify to be on the non-compliant product list, but the SFA does not have a noncompliant list/process in place for tracking.

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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is located on the procurement webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).

#### **Reporting and Recordkeeping**

##### **Comments/Technical Assistance (TA)**

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

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

##### **Comments/Technical Assistance (TA)**

##### **School Breakfast Program (SBP)**

- While the School Breakfast Program is not currently offered at the SFA, the success of the lunch program suggests implementing breakfast may be a well-received action that would benefit students nutritionally and financially benefit food service.



- When starting a breakfast program, the SFA's online contract will need to be updated to reflect the program's operations. The SFA should work closely with a Nutrition Program Consultant to add the program to the contract and begin submitting the appropriate claims for reimbursement.
- For information about starting and promoting a breakfast program please view the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>). A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).
- 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](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) 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>)

### 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 this SFA, 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 "Summer Meals" to 877-877 to find Summer sites
  - Promotion of the USDA Summer Food 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 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: SFSP Outreach

**Finding #9:** SFSP outreach was not completed.

**Corrective Action Needed:** Please provide a statement outlining how the SFA will inform families of the availability of SFSP for the upcoming summer and going forward.

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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