

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

School Food Authority: Cassville Public Schools Agency Code: 220994

School Reviewed: Cassville Elementary School

Review Dates: 12/4/18-12/6/18

Date of Exit Conference: 12/6/18

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, professional standards, meal benefit determination process, 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, and 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 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Cassville School District for the courtesies extended to us during the on-site review. Thank you for availability when answering questions and providing 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

Certification and Benefit Issuance

Free and Reduced Price Meal Applications

- 85 eligibility determinations were reviewed and zero errors were identified.
- Applications must be 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.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- 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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).
- 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.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

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

- 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 the application to be considered complete.

Incomplete Applications

- 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. 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, must be approved by the School Nutrition Team (SNT) at DPI.
- Thank you for using the DPI prototype letters.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

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.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- 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.

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.

Commendations/Comments/Technical Assistance/Compliance Reminders

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ **Finding #1:** Upon reviewing the sample pool of applications, many of the applications had missing information, such as household box numbers, parent names, and case number. These are considered "incomplete" applications. Technical Assistance was provided and discussed with the Elementary staff secretary who processes the applications.

Corrective Action Needed #1: Watch the webcast on the DPI website, [Filling out the Household Application](https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story_html5.html), in order to better understand what a "complete" application should look like (https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story_html5.html). Submit a signed statement explaining the process of how to check for a "complete" application, and then determine it. Another webcast, [Special Situations in the Free and Reduced Price Meal Eligibility Process](https://media.dpi.wi.gov/school-nutrition/special-situations-in-free-reduced/story_html5.html) may also be helpful (https://media.dpi.wi.gov/school-nutrition/special-situations-in-free-reduced/story_html5.html).

❑ **Finding #2:** The current applications on file for the 18-19 school year show that the Dean of Students had signed each application on the Confirming Official line on back of the applications. This is not correct. The Confirming Official listed on the contract is the Superintendent. Also, each application was signed on the confirming official line, and that is not necessary. The Confirming Official only signs the applications that are selected for Verification, after “confirming” the application was determined correctly and all math was checked. He would then sign off on the Confirming Official line.

Corrective Action Needed #2: The Confirming Official listed on the contract should familiarize themselves with the process of the four officials and how they apply to the application process. Watch the webcast on the DPI website, [Processing Applications and Direct Certification in Free/Reduced Price Meal Eligibility](https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html), to better explain the four officials and their roles (https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html). Submit a signed statement showing you have watched this and that you understand that your role is to only sign those applications selected for verification, after you have confirmed they were correctly determined and checked the math.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

The Verification Report was submitted by the required deadline.

Findings and Corrective Action Needed: Verification

❑ **Finding#1:** Verification was completed in accordance with USDA regulations. Three applications were verified, and Cassville only needed to verify two based on the number of applications on file as of October 1st. There were several errors on the Verification Collection Report that was submitted for the 18-19 school year. The errors found are repeat from the previous AR. Section 4 page was missing from the document received. Technical Assistance on completing the Verification Report was provided onsite.

Corrective Action Needed #1: Review the requirements involved in completing the VCR report in the Eligibility Manual for School Meals located on the DPI SNT website. Prototype forms are also available on the DPI website. View the webcasts, [Verification Collection Report](https://media.dpi.wi.gov/school-nutrition/submitting-the-verification-collection-report/story_html5.html) and [The Verification Process](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/submitting-the-verification-collection-report/story_html5.html; https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html). Submit a statement outlining your current process for Verification. After viewing the webcasts complete the VCR Report, submit it to DPI, and email the consultant a copy. After you have completed a new VCR, email a copy of each application that was selected for verification to DPI. Prototype forms are also available on the DPI website.

Please Note: The DPI School Nutrition Team offers summer training classes in all areas of the National School Lunch Program Requirements, including Verification Training. Visit the [School Nutrition Team Training Webpage](https://dpi.wi.gov/school-nutrition/training) for more information (<https://dpi.wi.gov/school-nutrition/training>).

Meal Counting and Claiming

During the Administrative Review of the Breakfast programs, we observed the breakfast program being served in the main Cafeteria in the High School, and an alternate site in the Elementary

School. There were significant discrepancies with the breakfast service in the Elementary school. Details on this and Corrective Action are listed below "Breakfast – Non Reimbursable Meals."

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Thank you to the Food Service Director (FSD) for sending documentation prior to the onsite visit as this greatly expedited the Administrative Review (AR). The FSD was responsive to emails and quick to submit needed documentation and clarification. The food service department is doing a nice job offering a variety of fruit and vegetables, both fresh, canned, and dried, to students daily. Nice varieties of vegetables from each subgroup are offered throughout the week (e.g. tomatoes, red peppers, carrots from the red/orange subgroup). The breakfast and lunch week of review had no meal pattern findings, which shows the menu planner knows and understands the meal pattern regulations well. There was great signage posted around the high school serving line with depictions of appropriate serving sizes for specific foods (e.g. a three-ounce portion of meat is the size of a deck of cards). The FSD goes beyond by hanging up signage for the day of service as well as the next day so that students can view the upcoming menu.

Technical Assistance and Program Requirement Reminders

Breakfast

Non-Reimbursable Meals

The alternate breakfast serving site located in Cassville Elementary School does not properly implement the School Breakfast Program (SBP). **On the day of onsite review, December 5, 2018, there were 77 non-reimbursable breakfasts. These meals are subject to fiscal action.**

Breakfast at Cassville Elementary School takes place 8:00-10:00am. Teachers bring their students down by classroom and allow them to make selections without checking for reimbursable meals. There was no point of service at the site of selection nor encouragement to select a fruit or the correct number of items to make a reimbursable meal. It was unclear if teachers had Offer versus Serve (OVS) training to determine reimbursable meals, as many students did not select what they needed. The majority of students came through the line only selecting one, sometimes two items rather than a full meal (e.g. one cheese stick or one milk or one cereal bar). ***The Wisconsin Department of Public Instruction (DPI) will reclaim all breakfasts served at Cassville Elementary School starting the beginning of the 2018-19 school year. The State Agency (SA) is not confident that students have been selecting reimbursable meals up until and including the AR on December 5, 2018.***

Additionally, any student who is not yet in kindergarten must be served the Child and Adult Care Food Program (CACFP) meal pattern if they are not co-mingled with other grades. The Pre-K students came through the line at a separate time as the other grades and therefore must follow the CACFP meal pattern. This meal pattern mandates that students must select one of everything served to make a reimbursable meal. More information on the CACFP meal pattern can be found under the CACFP technical assistance within this document.

The main serving area at Cassville School District is the high school, where the FSD cooks and serves meals. The breakfast model at this location was perfectly implemented and all students selected reimbursable meals. The FSD has a great understanding of breakfast OVS and knows what students must select to be able to claim for reimbursement. It is strongly encouraged that

the breakfast at the alternate site either move to the main service area where the FSD can ensure reimbursable meals are selected, or a staff member must be trained in OVS and present at the time students select reimbursable meals in this area. According to meal requirements for breakfasts outlined in 7 CFR 220.8 (b)(iii), a meal selected by each student must have the number of food components required for a reimbursable meal and include at least one fruit or vegetable. Any meals with less than the required amounts cannot be claimed for reimbursement. The intent of the USDA School Meals Programs is to ensure children have access to nutritious meals that promote healthy eating. These programs help fight hunger by reimbursing schools for providing these meals to children. Please thoroughly consider the recommendations listed.

Rice Krispie Bars

A Rice Krispie Treat was one of the breakfast entrées served during the day of review. While these are similar to cereal bars, they are typically considered treats or desserts and are not encouraged as a breakfast entrée. Consider serving something else such as plain Rice Krispies or other ready-to-eat cereals, or a different grain item more suitable as a breakfast entrée.

No Overlap for Grades 6-12 in the lunch meal pattern

Many serving sizes during the week of review were smaller for grades K4-5, and larger for grades 6-12. There is no overlap in calorie requirements for students in grades 6-12. This means grades 6-8 cannot follow the same meal pattern as grades 9-12. Keep this in mind as you plan menus for the week. Use the [lunch meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) for reference (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf).

Crediting, Meat/Meat Alternates

Meat/meat alternates are credited by weight, not by fluid ounces. Fluid ounces are a volume measure, while ounces are a weight measure. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 2 fluid ounce spoodle for an intended 2 ounce (by weight) serving of ground/diced/shredded meat. To ensure that students receive adequate amounts of meat/meat alternate, weigh the product, then determine which scoop will hold that weight. For example, the Teriyaki Chicken credits as 2.0 ounce equivalents (oz eq) for every 2.8 oz. by weight. Therefore, in order to credit 2.0 oz eq of the Teriyaki Chicken, you must serve 2.8 oz. by weight.

Production Records

Production records are useful tools to record information prior to production, during production, and following production. The current production record template uses language that is not currently applicable (e.g., Bread [which is now referred to as Grain]) and is very difficult to read. There is also missing information, such as serving site, total number of purchase units planned/prepared (e.g. 2 - #10 cans, 1.5 cases, etc.), planned serving size for many items and actual usage for condiments. Any food offered as part of a reimbursable meal must be recorded on production records. Be specific about serving sizes. A serving size of "1" is not specific when the weight, count, or volume has not also been specified.

During the week of review, breakfast production records listed 120 planned meals for all five days of the week. It is unlikely that this is accurate, especially when the actual number of meals served were always higher (e.g. 137, 141, etc.). Make sure the information listed on production records is accurate and current.

Be specific on production records about the identity, brand, and description of the items served. Instead of “grapes,” specify that it is bagged or packaged, and the weight of that bag or package. Instead of “Sidekicks,” specify which flavors, as there are flavors that credit toward the fruit component and flavors that credit toward the vegetable component. There is a wide variation in many products and being specific about the product helps reduce confusion among staff and ensures the menu, as it was intended, is served to students. Fruit sizes (e.g. case count) should also be recorded. Instead of “bananas,” include the case count as different sizes credit differently.

While there is no required production record template, there are some examples that may be used on our [Production Records](#) webpage. A copy of the production record requirements (“[Must Haves and Nice to Haves](#)” list) can also be found at that link (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g., hot apples, with added sugar and cinnamon). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. When taking a recipe from another source, make sure to re-standardize and re-write any changes in your operation. For example, the Cheesy Potato recipe has handwritten notes of other ingredients used (e.g. cream of chicken instead of cream of mushroom, dried onions instead of fresh). This must be re-written and re-standardized to your operation as the yield has likely changed and the crediting can no longer be validated. The FSD sent an updated copy.

Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Crediting

Grape Escapes

The crediting of the Grape Escapes is incorrect. According to the Food Buying Guide (FBG), a ½ cup of whole grapes without stems weighs 2.744 ounces. The Grape Escapes packaging weighs 2.25 ounces, which is less than 2.744 ounces and therefore cannot also credit ½ cup. The Grape Escapes credit ¾ cup (1 lb [16 ounces] = 2.915 cups. Therefore, 2.25 ounces × 2.915 cups ÷ 16 ounces = 0.4099 cups, which rounds down to the nearest ⅛ cup; ¾ cup per serving). When this product is offered, ensure that staff and students understand it is not quite ½ cup fruit and cannot be the only fruit and/or vegetable on their tray. They will have to select more fruit and/or vegetable to make a reimbursable meal.

Cheesy Potatoes

Meat/meat alternates credit in quarter oz eq, always rounded down to the nearest quarter oz eq. The meat/meat alternate for this recipe stated 0.4 oz eq, but should state 0.25 oz eq. as that is the nearest quarter oz eq.

Child and Adult Care Food Program (CACFP)

CACFP, Co-mingling flexibility - misuse

Preschool students are allowed to be served the K-5, K-8, or K-12 breakfast menu *if* they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA. Children who are not yet in kindergarten must be served the

updated CACFP meal pattern if not co-mingled with other age/grade groups at meals. During on-site observation, preschool students were served the K-12 breakfast menu, but were not being served at the same time as the other students. They were coming down by classroom with large amounts of time in between. Because of this, they must be served the CACFP meal pattern.

CACFP, Sugar in Cereal

The 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. All cereals served during the day of review except one was 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 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cereals-CACFP.pdf>).

CACFP, Sugar in Yogurt

The CACFP meal pattern requires yogurt to contain no more than 23 grams of total sugars per 6 ounces. This requirement will help reduce children's consumption of added sugars. The yogurt served on the day of review was above the sugar limit for the serving size. To determine if a yogurt meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams or ounces) found on the nutrition facts panel. The answer must be less than the 0.135 threshold for sugar in yogurt if using a serving size in grams and 3.83 if using a serving size in ounces. Alternatively, a [sugar limit chart](#) for yogurt may be used to determine if yogurt meets the sugar requirements (https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/yogurt_in_cacfp.pdf).

CACFP, Grain-based Desserts

Grain-based desserts are not creditable toward the grains component under the CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. There was a Chocolate, Whole grain-rich Rice Krispies bar served to those not yet in kindergarten during the day of review. For a complete list of foods considered 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>).

CACFP, Milk types

Only unflavored milk is allowable under the CACFP meal pattern. Flavored milk may not be served. Children 2-5 years old and not yet in kindergarten should be served **unflavored** low-fat (1%) or unflavored fat-free (skim) milk. Discontinue serving skim chocolate milk to those not yet in kindergarten. The Smarter Lunchrooms Movement has strategies to [encourage the consumption of unflavored milk](#) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

CACFP, Offer Versus Serve (OVS)

Offer Versus Serve (OVS) is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service.

CACFP, Family style meal service

When using family style meal service, a sufficient amount of prepared food must be placed on each table to provide the full required portions of each of the food components for all children at the table, and to accommodate supervising adults if they eat with the children. Family style meal service allows children to make choices in selecting foods and the size of initial servings. Children should initially be offered the full required portion of each meal component. Supervising adults should actively encourage (but not force) children to try components and accept full portions during the meal. If a child refuses to take one or more food components, he or she should be offered that food again before the meal is finished.

Milk is a required component to be offered to children when using family style meal service. Small, child-size pitchers are recommended for children to serve milk to themselves. Teachers may serve the milk when using family style meal service; however, children must be served the full serving of milk when doing so.

More information on CACFP topics can be found on SNT's [Infant and Preschool in NSLP](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). Additional resources are available on the Community Nutrition Team's [Nutrition and Wellness Training](https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice) webpage, under the Meal Service heading (https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice).

For questions about the updated CACFP meal pattern, please contact our specialists: Tanya Kirtz at Tanya.Kirtz@dpi.wi.gov or Erin Opgenorth at Erin.Opgenorth@dpi.wi.gov.

Findings and Corrective Action Needed: Meal Pattern

Finding #1: Cassville School District does not properly implement the SBP at Cassville Elementary School. Students are not selecting reimbursable meals.

Corrective Action Required: Submit a detailed plan for how Cassville School District will properly implement the SBP at Cassville Elementary School to be in compliance with federal regulations. Include details about the OVS training, counting and claiming system, and point of service. Include a timeframe for which to implement this new system. **There will be an onsite visit to confirm this plan is implemented properly. Cassville Elementary School will be disallowed from claiming until an acceptable corrective action plan is implemented and approved.**

Finding #2: Production record requirements are not consistently met. The serving sizes for menu items and the planned/actual number of servings in purchase units are not consistently recorded on breakfast or lunch production records.

Corrective Action Required: Send one week of completed production records for both breakfast and lunch with all information filled out thoroughly and consistently. It is highly recommended to use DPI production record templates, which meet all production record requirements. The current ones in use are unorganized and difficult to read, which makes it tough for staff to interpret. **A sample DPI production record with information filled out was emailed to the FSD 12/6/18.**

Finding #3: There was no breakfast signage at the alternate breakfast service location. Breakfast signage must be posted where students select their meals.

Corrective Action Required: Submit a picture of signage posted near the breakfast serving line showing students how they can select a reimbursable meal.

Finding #4: The two kitchen staff members at lunch and the teachers that brought their students through the line at breakfast do not have a firm understanding of OVS requirements. All could benefit from additional OVS training.

Corrective Action Required: Have the two kitchen staff members (other than FSD) and the teachers responsible for bringing their students through the breakfast line at Cassville Elementary School view the [Offer versus Serve - Meal or No Meal Lesson and Game](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html) webcast. They must take the quiz located at the end of the webcast and submit the confirmation email as proof of viewing (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html). More OVS and other training webcasts are available on the [Webcast webpage](https://dpi.wi.gov/school-nutrition/training/webcasts) (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Buy American

Technical Assistance and Program Requirement Reminders

The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, farmers, and provides healthy choices for children in the USDA School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed by, manufactured by, or packed in, the U.S, but the country of origin is not listed, this product requires additional information from the distributor on where the product is originally from.

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 #1: The following products were identified in the SFA's storage area as non-domestic and not documented:

- Canned Mandarin oranges (China)
- Canned Pineapple Tidbits (Indonesia)

Corrective Action Required: Complete and submit [Non-Compliant Product Forms](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) for the products listed above (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Smart Snacks

Technical Assistance and Program Requirement Reminders

Smart Snacks, Overview

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. This is to increase consumption of healthful foods during the school day and support a healthy school environment. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. For more information, visit the [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

DPI allows two fundraiser exemptions per student organization, per school, per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule. However, this may not occur in the meal service area during meal service times. There are no selling restrictions with compliant fundraisers.

To determine if a product meets smart snacks regulations, use the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage to assess product compliance. Simply answer a series of questions to determine if the general and nutrition standards are met, then save and print the results for your records (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Findings and Corrective Action Needed: Smart Snacks

Finding #1: Cassville School District sells food during the school day outside of a reimbursable meal, but it is unclear if these are tracked or if products are compliant.

Through phone conversations with the FSD on November 8, 2018, the Public Health Nutritionist (PHN) was told there were no fundraisers at Cassville School District. Once onsite, the PHN found posters advertising food for purchase. The FFA sells Country Meat sticks and the Comet Corner sells granola bars, chips/snacks, and coffee to students per signage posted around the school hallways. No documentation was provided prior to the AR nor onsite, therefore it is unclear if these meet smart snack standards. Through discussion with a faculty member, grades 7-12 also have access to coffee sales. Caffeinated beverages are only allowed to the high school level, therefore grades 7-8 should not be allowed to purchase this product.

The following was written in the last AR report (SY 2014-15) and continues to apply to this AR:

Finding #8: Smart Snack regulations apply to all food and beverage items sold to students during the school day, with the school day being designated as midnight the night before until 30 minutes after the end of the school day. These regulations apply to foods and beverages sold by other groups (i.e. FFA, school store, etc.) in the district. Since Smart Snack regulations apply district-wide, it is important that all involved with the sale of food and beverage items, not just the food service department, be involved in monitoring and complying with regulations. Involvement and cooperation of administration is highly recommended and encouraged. It is important to remember that the goal of Smart Snacks is not to regulate what students can and cannot have, but it is in place to build healthy school environments and teach valuable life nutrition skills to all students.

Corrective Action Needed: Submit a summary outlining who will be responsible for oversight of Smart Snack regulations within Cassville School District. Include examples of education provided to all involved with the sale of food and beverage items (i.e. FFA) in the school district and include details as to how various groups will ensure compliance with these regulations. Additionally, address how current food and beverages not meeting Smart Snack standards will be made to comply with these regulations. Use the [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) to review the guidelines (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account Commendations/Comments/Technical Assistance/Compliance Reminders

Technical Assistance was given to show where to find the current statement on the DPI website, and a current paper copy was also provided. The current statement needs to be on all informational materials distributed to families. Additionally, when space does not allow the full statement to be used, such as the case with menus, the shortened statement can be used which is “This institution is an equal opportunity provider”.

❑ **Finding #1:** Outdated non-discrimination statements were used on materials.

Corrective Action Required #1: Use the current 2018-2019 Non-Discrimination statement on all food service program materials and check the DPI School Nutrition website annually for the most current Non-Discrimination statement. The current non-discrimination statement can be found on [DPI’s Civil Rights webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights).

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you for completing the Paid Lunch Equity Survey. There is a positive balance in the Food Service Account.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: adult meals, ala 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 nonprogram food costs 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.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA

nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

$$\frac{\textit{Nonprogram food revenue}}{\textit{Total program and nonprogram revenue}} \geq \frac{\textit{Total nonprogram food costs}}{\textit{Total program and nonprogram food costs}}$$

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the minimum pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<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>)

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- Finding #1:** The Nonprogram Foods Revenue Tool was not completed for the current school year.

Corrective Action Required #1: Watch the [Nonprogram Foods Revenue Tool](#) webcast (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html). Submit a copy of the quiz completion confirmation email and a copy of the completed tool for Cassville School District using a 5-day reference period.

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

No indirect costs were found on this review. No further action needed.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Civil Rights Training is completed and documented each year for staff in Food Service and staff in the offices that complete Food Service Reporting and Applications.

Findings and Corrective Action Needed: Civil Rights

❑ **Finding #1:** The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by Cassville School District for the 18-19 School Year. This same issue was found during the last AR in 2015.

Corrective Action Required #1: Complete the PI-1441 form and submit a copy to DPI. This form needs to be completed and reviewed each year and retained onsite at Cassville School District.

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

The on-Site Monitoring Form was not available for Breakfast or Lunch during the on site for our review. After speaking with the SFA, and also office personnel, a blank copy was printed, and the superintendent filled it out and returned to us while on-site. While this is not common practice, it was completed. The Breakfast Program also requires an On-Site Monitoring Form to be completed. These are to be reviewed and kept on file at Cassville School District, per the record retention law.

Findings and Corrective Action Needed: On-site Monitoring

❑ **Finding #1:** The On-site Monitoring form was not available. When asked for by the auditor, the form was printed and filled in by the superintendent and returned to the auditor onsite. On-Site Monitoring Forms for Breakfast and Lunch Programs should be complete by the SFA each year and kept on file. The SFA is very knowledgeable in Food Service, and knows what is necessary per the USDA requirements and subsequently filling out the on-site monitoring forms.

Corrective Action Required #1: Complete On-Site Monitoring Form for the Breakfast Programs. Submit a copy to DPI, and keep one on file at Cassville School District. It is best practice for the Food Service Director to fill in this form as he/she visits each building in the district that serves meals and has extensive knowledge regarding food service requirements.

Public Release

- All SFAs are required to distribute a Public Release to three grassroots organizations before the start of the school year. The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must try to distribute the Public Release to the following:
 - 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 it published but must maintain documentation of whom the release was sent to along with the specific materials distributed.

❑ **Finding #1:** The Public Release was not completed for the 18-19 school year, per the calendar of requirements deadline.

Corrective Action Required #1: Submit a signed statement describing the process of distributing the public release. Please also submit a sentence explaining you understand the Calendar of Requirements detailed on the DPI website and will use it for the future to ensure the deadlines are met for required program materials to be submitted.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

The Cassville School District has a Wellness Policy in place. It contains all the requirements needed. Good job!

Professional Standards

- 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.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- **Annual Training Requirements for All Staff**
Directors: 12 hours
Managers: 10 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.

Commendations/Comments/Technical Assistance/Compliance Reminders

All staff involved in any aspect of the National School Lunch and School Breakfast Programs are required to do Professional Standards training annually. The training is up to date, documented and kept on file. No further action needed.

Water

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Commendations/Comments/Technical Assistance/Compliance Reminders

Water is available inside the cafeteria via the water fountain. Students are able to access it at any time.

Reporting and Recordkeeping

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. "LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP." Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.
- 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.

Commendations/Comments/Technical Assistance/Compliance Reminders

Records are retained for 3 years plus the current year. Nice job!

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

Commendations/Comments/Technical Assistance/Compliance Reminders

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 Cassville School District, USDA would like 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](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
Phone: 608.266.7124

e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action Needed: SFSP and SBP Outreach

❑ **Finding #1:** Distribution of information on Summer Food Service for families in the Cassville School District was not available at the time of our review.

Corrective Action Required #1: Submit a statement to DPI explaining how you distribute information on Summer Feeding programs to families in the school district.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

- Wisconsin School Day Milk Program requires the distribution of free milk to free and reduced priced students in K-5.
- Point of Service Counts (POS) for the Wisconsin School Day Program and the Special Milk Program must be recorded by who “did” take milk not by marking who “did not” take one.

Findings and Corrective Action Needed: WSDMP

❑ **Finding:** The Counting and Claiming process for the distribution of milk is not clear.

Corrective Action Required: Submit a statement explaining the complete POS process that is used for the milk program, and explain how and when they are charged for the milk.

Elderly Nutrition Program (EN)

Commendations/Comments/Technical Assistance/Compliance Reminders

The practice of claiming meals for the Elderly Nutrition has ceased per the last AR in SY 2014-15. Cassville is still preparing meals for the program and delivering them, but no longer claiming them. No further action needed.

Schools agree to comply with the regulations set forth by USDA when choosing to participate in the USDA School Meals Programs. Therefore, noncompliance of regulations can result in the loss of federal funding. Based on repeat findings and significant non-compliance for the School Breakfast Program for Cassville Elementary School, Cassville School District has been placed in claims withholding. Reimbursement will be held until all corrective actions for the AR are submitted, approved and validated on a future onsite visit.

Carolyn Stanford-Taylor, 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 your students' success.

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

