USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Barneveld School District Agency Code: 25-0287

School(s) Reviewed: (20) Barneveld Elementary

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:

- 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 <u>School Nutrition Training</u> webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their <u>Healthier School Day: The School Day Just Got Healthier</u> 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 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 Barneveld School District for the courtesies extended to us during the review. Overall, the agency is running a nice program. Staff were receptive to recommendations and our office has confidence that improvements will continue with the new Food Service Director's leadership. We would also like to acknowledge administration's involvement and support of the food service operation. Kitchen staff work as a team and are invested in serving the students nutritious meals. Thank you for all your do!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/ Technical Assistance (TA)/Compliance Reminders

55 eligibility determinations were reviewed, no errors were identified. Meal and milk eligibilities are determined in a timely manner, which helps minimize unpaid meal charges. Keep up the good work!

Notification Letters/Templates

A recommendation was made to obtain *all* Free and Reduced materials from the <u>DPI School Nutrition</u> <u>Free and Reduced Price Meal website</u> (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications). Materials are updated annually in June. Do not distribute until after July 1.

Denial Template

Households with children who are denied benefits must receive prompt, written notification of their denial. The notification may be provided by mail or e-mail to the adult household member who signed the application. The notification must advise the household of:

- Reason for denial of benefits;
- Right to appeal;
- Instructions on how to appeal; and
- Ability to reapply for free and reduced price benefits at any time during the school year.

SNACS

If the district would like to pursue an automated benefit issuance/verification software system and have access to an online application module, DPI provides a free program called <u>SNACS</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snacs-brochure.pdf). This system will not replace your current point of sale software, but can be set-up to load data from SNACS into PowerSchool.

Findings and Corrective Action Needed: Certification and Benefit Issuance

☐ Finding #1: The SFA's denial notification letter is missing language stating the household has the right to appeal with instructions on how to appeal.

Corrective Action Needed: Submit an updated template letter that communicates all required information as listed above under technical assistance. If you plan to use the DPI notification letter/template moving forward, submit a statement confirming the change in practice.

Verification

No errors. Great job!

Meal Counting and Claiming

Technical Assistance (TA)/Compliance Reminders

Edit Check

Regulations require school agencies to complete an edit check, which incorporates an attendance factor for each of its schools that participate in the NSL prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch

counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made. Although it is not required to complete an edit check incorporating an attendance factor for breakfast, USDA regulations prohibit claiming for free and reduced price breakfasts in excess of the number of children approved for free and reduced price breakfasts. Utilizing the edit check is the best way to ensure an internal control is in place.

Findings and Corrective Action Needed: Meal Counting and Claiming

Finding #1: The individual site edit check was not used to determine the number of reimbursable
meals to claim by eligibility for breakfast and lunch. There was also a non-systemic NSL claim
consolidation error in October at the review site and non-review site. A manual adjustment was made
in October, this did not happen in September and the Meal Count Summary Report matched the Edit
Check Report. Fiscal action will be calculated on the difference between the SFAs October NSL
count and the SAs October NSL count.

Corrective Action Needed: Begin using the edit check report by site to consolidate the monthly claim. Submit your breakfast and lunch edit check for the month of November to support the numbers claimed in the online system.

☐ Finding #2: An error was found on the Power School MS/HS NSL edit check report showing more meals claimed in the reduced category than those eligible. This was noted on multiple days during the review period. The reviewer was able to obtain the effective eligibility dates for all MS/HS students on the manual BI list, which supported the number of reduced lunch counts claimed. This is a systemic issue that must be corrected.

Corrective Action Needed: Contact Power School and/or work with your IT department to correct the programming error. Submit a statement explaining how the issue was remedied. The number on the left can never be greater than the number on the right in brackets.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

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

Thank you, also, to the Food Service Director for sending documentation and promptly answering questions both prior to the on-site review and during the on-site review. We very much appreciate all that you do for the students of Barneveld School District!

Comments/Technical Assistance/Compliance Reminders

Training:

Anyone involved with the United States Department of Agriculture (USDA) School Meal Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free and reduced meal applications, meal pattern, and record keeping requirements.

Travel and meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's Training Page (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's Webcast Page (https://dpi.wi.gov/schoolnutrition/training/webcasts).

Point of Service:

All components of a reimbursable meal must be available to students prior to the Point of Service (POS) for reimbursable meal lines. On day of observation, milk was only available to students after the POS at breakfast. TA given onsite to utilize an available milk cooler ahead of the POS to ensure all students had access to all necessary components to build a reimbursable breakfast.

Crediting Documentation:

- Storing and Maintaining Updated Crediting Documentation: Food used in the Child Nutrition Programs must have proper crediting documentation available. Sources of this information are the USDA Food Buying Guide, Child Nutrition (CN) labels, and product formulation statements (PFS). CN labels and PFS are required for food purchased in processed form. Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. SNT recommends maintaining and organizing this information in a manner that is easy to reference and update, such as a binder or file folders divided into categories. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted. Furthermore, up-to-date CN labels and PFS statements allow for ease when crediting food items towards lunch or breakfast standards.
 - HoneyNut Cheerios Boxes and Apple NutriGrain bars were found to have inaccurate crediting information. TA given onsite and use of these products was discontinued.
- Standardized Recipes: Any menu item that has more than one ingredient should have a standardized recipe. This is needed for menu planning in order to produce consistent quality and yield every time, which is crucial for crediting recipes and menu planning as it ensures that each meal is consistently planned to meet the daily and weekly requirements. Continue to work towards recipe standardization and use all resources available to you. Visit our Standardized Recipes webpage for additional tools and resources or Continue to work towards recipe standardization and use all resources available to you. Visit our Standardized Recipes webpage for additional tools and resources or Continue to work towards recipes standardized Recipes webpage for additional tools and resources or Continue to work towards recipes webpage for additional tools and resources or Continue to work towards recipes webpage for additional tools and resources or Continue to work towards recipes webpage for additional tools and resources or Continue towards recipes webpage for additional tools and resources or Continue towards recipes webpage for additional tools and resources or Continue towards recipes webpage for additional tools and resources or Contact a Public Health Nutritionist for assistance (https://dpi.wi.gov/school-nutrition/directory).
 - Additionally, when standardizing a smoothie recipe, please note that the creditable amount of fruit is the volume of the pureed fruit or 100% juice used. This fruit will credit as juice. For more information on crediting smoothies, visit our Meal Pattern Components webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/meal-pattern).
- In-House Yield: It is important for point of service staff to know how foods credit, which can be difficult for items that do not easily conform to a portioning utensil such as raw vegetables and fruits. Therefore, the quantity of each fruit or vegetable needed to credit as a specific volume must be determined. For some items, this this can be done using the USDA Food Buying Guide (https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs). Additionally, if products received are a significantly different size than usual, or are not found in the Food Buying Guide, an in-house yield study is recommended. In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service

operation and will be reviewed during the school food authority's next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG. Specific and verifiable procedures (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-house-yield-study-procedures.pdf), which must be followed, are available on the Menu Planning webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy)

- TA given onsite:
 - 2-oz bag of carrot was being credited as ½ cup vegetable. However 2-oz carrots credits as ¾ cup vegetable using the FBG, meaning any student selecting only the 2-oz carrot pack as their only fruit or vegetable would not meet the ½ cup fruit or vegetable requirement unless an In-House Yield study has been completed to support the ½ cup crediting.
 - The 117-ct kiwi listed on production records for the week of review has no applicable entry in the FBG. An In-House Yield study would be necessary to show how these kiwis contribute towards the meal pattern.

Production Records:

Production records are intended to be useful tools to record information prior to production, during production, and following production. Accurate production records aid the menu planner with forecasting, ordering, future menu planning, and reducing both food waste and food costs.

It can be helpful to have templates for common cycle menu items and daily offerings, however these templates need to be detailed and to reflect the foods and products currently in use. The current breakfast production records list numerous foods that are no longer served without space for items that have recently been added.

Continue to work with all staff members to record planned usage, actual usage, and leftovers for any food offered as part of a reimbursable meal. While there is no required production record template, there are some examples, including multiple age/grade groups that may be used on our Production Records webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/production-records). A copy of the production record requirements ("Must Haves and Nice to Haves" list) can also be found at that link.

Dietary Specifications:

- Portion Control: Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e. the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches children good eating habits by demonstrating and providing appropriate portion sizes of each food group at a meal. Proper portion control also ensures a reimbursable meal is served, so students receive the planned quantity of the food component (e.g. two ounce equivalents [oz eq] of grain) or nutrients. Food costs are controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase. Proper portion size utensils should be used to serve food; if a tool does not measure, it is not a portion tool. For example, using tongs on a salad bar will make it difficult to ensure that adequate portions of vegetables are served. When using a utensil such as tongs, it is recommended that a properly measured reference sample be kept nearby for comparison.
- Weight vs. Volume Measurements: Meat/meat alternate (M/MA) is credited by weight, not by fluid ounces. Spoodles and measuring cups measure fluid ounces, not ounces by weight, so it is not

- appropriate to use a 4 fluid ounce spoodle or a one-half cup measuring cup for an intended 4 ounce (by weight) serving of ground/diced/shredded meat. Fluid ounces are a volume measure, while ounces are a weight measure. To ensure that students are receiving the adequate amount of M/MA, weigh the M/MA, then determine which scoop will hold that weight of meat.
- **Juice Limit** No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. Currently at breakfast, half of the fruit offered is in the form of juice (½ cup of juice and ½ cup of fruit daily). If Foodservice decides to add a smoothie to the breakfast menu, the creditable portion of fruit in the smoothie will credit as fruit juice, which will exceed the maximum over the course of the week. Adjust the amount of juice offered in addition to the fresh, frozen, or dried fruit to abide by the 50 percent juice limit as needed.
- Full sodium or full-fat foods: Currently, various high-sodium and full-fat condiments are being used in standardized recipes and common food offerings. A few examples include Bar-B-Que Sauce, seasoning packets, and mayonnaise. While these foods do not credit towards the meal pattern, they must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium), which may make it very difficult to stay within the dietary specification limits if these "extras" are consistently offered on a routine basis. Occasional use of such foods is allowable and can be a nice incentive for participation for menu items with historically low sales, however frequent use of high-sodium, full-sodium, and full-fat foods is strongly discouraged and does not align with the intention of Child Nutrition Programs to help students develop healthy eating habits. TA provided onsite for purchasing items that are lower in sodium or fat than their regular-strength counterparts.
- Menu planning and Meal Pattern Compliance: Meeting daily and weekly meal pattern requirements. The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. When multiple reimbursable meals are offered, it is important to make sure that each meal service line meets the daily and weekly meal pattern requirements separately because students are only able to select one entrée option. This includes all alternate entree combinations and options. While not compulsory, it may be beneficial to use our Menu Planning Worksheets to assist with ensuring that all available entree items meet daily and weekly requirements. These may be found on the NSLP Menu Planning weebpage, under the Menu Planning Worksheets heading (dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning#menuplanningtools).
 - o **Food Costs:** Food costs are controlled by portioning and menu planning, reducing the number of leftovers, and simplifying forecasting and calculation of food quantities needed to purchase. Currently, all food items at breakfast are planned to count as one item, even if the item has 2+ oz eq of grains, and no upper limit on number of items is enforced. One elementary student was observed to select 2 Uncrustable sandwiches (1 oz eq grain + 1 oz eq M|MA, each), 1 Ultra banana bread slice (2 oz eq grain), ½ cup juice, and 1 cup milk. Additionally, students are allowed to choose between 4-5 fruit items daily at lunch with no enforced limit. On day of observation, multiple students took 2-3 applesauce cups and/or fruit cups in addition to fresh fruit or dried fruit. This can add significantly to food costs and dietary specifications. Consider simplifying breakfast and fruit offerings through menu planning and adequate signage.

Low Breakfast Participation:

Upon completion of school and cafeteria renovations, we encourage you to consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break district wide to aid in increasing student participation. Breakfast in the Classroom works well in elementary schools and midmorning models tend to work well in middle or high school environments where they have a passing time

that would allow them to grab a meal between classes. This could be set up in the cafeteria or with mobile carts in the hallways. More information is available on the <u>School Breakfast Program</u> webpage (https://dpi.wi.gov/school-nutrition/school-breakfast-program).

Offer Versus Serve (OVS):

There is some confusion over the difference between OVS and the planned menu. The planned menu must be in compliance with all meal pattern requirements, both daily and weekly. Therefore, the printed menu, recipes, portion sizes on production records, etc., should reflect the menu and portion sizes as planned. OVS occurs only during meal service and is the student's ability to accept or deny meal components. At lunch, a selection of at least three food components from the five components offered is required for adequate, nutritious meals for students and to warrant federal reimbursements. Within each component, different food items may be offered, giving students many combinations for building a reimbursable meal. Other than selecting the required minimum 1/2 cup fruit, vegetable, or combination serving, in addition to two other full food components, it is the student's choice to select or decline a food component. If only three components are selected, and two of these are fruit and vegetable, the student may only select the 1/2 cup portion for the fruit OR vegetable. For the other two components, the student must select at least the daily minimum required serving of the components for them to be counted. The Offer Versus Serve Guidance manual and the Offer Versus Serve Webcast can be used as training resources (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf and https://dpi.wi.gov/school-nutrition/training/webcasts).

Corrective Action

Once the Public Health Nutritionist has all crediting documentation, information, and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

- ☐ Finding #1: Unacceptable or Missing Crediting Documentation. Processed foods that are not listed in the USDA Food Buying Guide for School Meal Programs must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. Please provide crediting information by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the following products:
 - Dole Fruit Cups (additional documentation from the manufacturer needed)
 - UBR Oatmeal Raisin (CN or PFS needed)
 - BLB Muffin (CN or PFS needed)
 - Strawberry Bagel (CN or PFS needed)
 - Mini Cinnis (CN or PFS needed)
 - Frudel (CN or PFS needed for each flavor)
 - Poptarts (CN or PFS needed for each flavor)

You should discontinue use of any products for which proper crediting documentation cannot be obtained. More information about crediting documentation can be found on the <u>NSLP Menu Planning</u> webpage, under the Child Nutrition Labels and Product Formulation Statements heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

Corrective Action Needed: Finding #1 Provide crediting documentation for the items listed above.

\Box	Finding #2.	Insufficient portion	information
_	FILIUITIE # Z.	IIISUITICIEIIL DOLLIOII	i illi of Illation.

Meat|Meat Alternate and Grain components are credited by weight, measured in ounce equivalents. Two menu items from the week of review, 0.5 cup BBQ Pork and 0.33 cup Mac-and-Cheese (both 10/15), were portioned, served, and recorded using volume measures, providing insufficient information to credit these products towards the National School Lunch Program.

Fruit, Vegetables, and Milk components are credited by volume, measured in cups (or fractions of cups). One vegetable item from the week of review, 4 Smile Fries (10/16), was portioned by counting individual pieces rather than by volume, providing insufficient information to credit these products towards the National School Lunch Program. The Food Buying Guide may be used to credit some potato products by weight in addition to volume.

Corrective Action Needed: Finding #2 Please provide the following:

- The weight (ounces) measurement for 0.5 cup BBQ Pork and 0.33 cup Mac-and-Cheese.
- The volume measure for 4 Smile Fries from an in-house yield study or the weight or a serving of 4 Smile Fries.
- ☐ Finding #3: Missing or inaccurate Standardized Recipes. Any menu item that has more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used.

Standardized Recipes were not available for:

- Hamburger
- Cheeseburger (quantity recipe provided onsite)
- Chicken Patty Sandwich (quantity recipe provided onsite)
- Breakfast Smoothies
 - Strawberry-banana smoothie (recipe provided, but not up-to-date with current food products and kitchen practices; as crediting could not be determined prior to meal service, the smoothie was not credited toward the meal pattern)
 - Berry Smoothie
 - Mango Smoothie
- Rice Pilaf

Corrective Action Needed: Finding #3: Submit updated, standardized recipes for the menu items listed above. If discontinuing use of these menu items, please submit a written statement describing your plan to do so.

Finding #4: Grain shortage during week of review. Each entrée, including all alternate entrees
students have access to, must be considered as a separate service lines and be evaluated for meal
pattern compliance individually. The 2-item daily alternate entree limits student selection as follows:

Category 1: Uncrustable (1 oz eq M|MA, 1 oz eq grain), granola (1 oz eq grain) OR muffin (1 oz eq grain)

Category 2: String cheese (1 oz eq M \mid MA), 5-oz cottage cheese (1.25 oz eq M \mid MA) OR yogurt (4 oz yogurt = 1 oz eq M \mid MA or 6 oz yogurt = 1.5 oz eq M \mid MA)

The alternate entree is planned such that students may select only one item from each of the two categories from the list above. All combinations of the above food items meet daily minimum requirements based on the minimum a student can select. However, multiple combinations of food items do not meet the weekly K-8 meal pattern requirement of a minimum 8.0 oz eq grain and 9.0 oz eq Meat|Meat, based on the minimum combination a student could select. As currently structured, there are multiple alternate meal entrees that contributed to the weekly shortages. For example, a student could select granola + 4-oz yogurt daily (meal contribution: 1oz eq grain + 1 oz eq M|MA, daily; 5 oz eq grain + 5 oz eq M|MA, weekly). While that meets the daily minimum 1oz eq grain and 1 oz eq M|MA requirement for the K-8 meal pattern, it falls short of the weekly requirements of ≥ 8 oz eq grains and ≥ 9 oz eq M|MA. See attached addendum for a full list of alternate entree items and identified shortages.

Fiscal action is required for select repeat violations found during an Administrative Review (AR) for all sites, both those reviewed and not reviewed, in which the non-reimbursable meals were served. Because grain shortages were found during the last AR as well as the current AR, fiscal action will be applied. There will be a re-claim for meals for one weekday with the lowest participation at each site with grain shortages (the Elementary and Middle Schools). The following finding was documented from the School Year (SY) 2015-2016 Administrative Review, which is a repeat finding during the current AR:

"The week of review contained grain shortages for both grades 6-8 and 9-12. Each option must meet the minimum meal pattern requirements. Grades 6-8 must be offered a minimum of 8 oz eq grain per week, and during the week of December 14-18, only 7.25 oz eq grain was offered. Grades 9-12 must be offered 2 ounce equivalents of grain per day. During the week of review, there were grain shortages for grades 9-12 on Monday, Tuesday, and Wednesday."

Corrective Action: Finding #4 Please provide both two-weeks of completed production records and a written statement detailing the changes made to the alternate meals served in order to bring the menu into compliance.

Finding #5: Non-reimbursable Meals. Food service staff were somewhat unclear about the Offer
versus Serve (OVS) requirements for both breakfast and lunch. Three non-reimbursable meals were
observed at breakfast, all of which were missing the full ½ cup fruit or vegetable requirement. While
all students observed at lunch took a reimbursable meal, it is important for staff to fully understand
the OVS requirements. Students must not be required to take more items than necessary to make a
reimbursable meal if he or she initially declines an item(s).

Corrective Action Needed: Finding #5 - Conduct a staff OVS training and submit a dated sign-in sheet.

- ☐ Finding #6: Inaccurate and Incomplete Production Records. Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. The production record template currently in use is not being filled out properly and is lacking accurate information, including:
 - Menu type

^{**}Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.

^{**}Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.

- Planned Serving Size
- Crediting Information
- Actual number of servings prepared
- Actual quantity prepared in purchase units
- Accurate menu items by name, reference number, or product name/description
- Milk types available and actual usage by type

Corrective Action: Finding #6 - submit 2 weeks completed Breakfast and Lunch production records

☐ Finding #7: Inadequate signage. The National School Lunch Program requires that schools identify, near or at the beginning of the serving line(s), what constitutes the unit priced reimbursable meal(s) at breakfast and lunch. Breakfast menu was absent on the day of observation (November 13th) and lunch signage was both inaccurate (stating that the students must select 2 choices from the Meat/Meat Alternate, Grains, and Milk categories) as well inaccessible to students (posted on top of equipment outside of the serving area). The handwritten daily menu did not communicate serving sizes to students nor what they could select to build a reimbursable meal.

Corrective Action Needed: Finding #7 - Update and post adequate signage that clearly identifies what constitutes the planned unit-priced reimbursable breakfast and lunch meals. Submit photo of updated signage.

☐ Finding #8: Inaccurate Printed Menus. The printed menu, including the one posted to the school's website, should list all components included with the reimbursable meal. Fruit and milk were missing from the lunch menu for the week of review and are not consistently part of the current menu. The printed breakfast menu does not accurately reflect menu items available and lists a breakfast "round" as a "cookie," which is not an allowable breakfast item.

Corrective Action Needed: Finding #8 - Update and post adequate menus that clearly reflect all components offered as part of a reimbursable meal. Submit photo or PDF of updated print menus. Include a list of menu items that students may select as part of a reimbursable breakfast.

☐ Finding #9: Milk component offered after point of service. On day of observation, milk was available to students only after the point of service for the reimbursable breakfast line. All components of a reimbursable meal must be offered prior to the point of service.

Corrective Action Needed: Finding #9 - Corrected onsite, no further Corrective Action required.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance (TA)

Annual Financial Report (AFR)

All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated by program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance. The <u>Annual Financial Report</u>

<u>instructions</u> are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).

Equipment Preapproval

If you plan to purchase equipment that has a useful life of more than one year with funds from the nonprofit food service account and the estimated cost exceeds the School Food Authority's (SFA) capitalization threshold or \$5,000 (whichever is less), you will need to factor another step or two into your procurement process. The first step is to review the Preapproved Equipment List https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/preapproved-equipment-list.pdf). If the equipment purchase is listed, no further action is needed.

If the equipment you wish to purchase is not on the Preapproved Equipment List, you will need to submit a PI-6206 form requesting approval from the School Nutrition Team (SNT) before purchase. The SNT will ensure allowable equipment purchases were made based on the Preapproved Equipment List or the preapproval process. If unallowable purchases are identified or are improperly procured, the SNT will determine if a fund transfer from nonfederal sources to the nonprofit school food service account is required.

<u>PI-6206 Form</u> (https://dpi.wi.gov/school-nutrition/procurement/equipment-prior-approval): Complete this for equipment not on the Preapproved Equipment List

<u>Instructions for Completing the PI-6206 Form</u> (https://dpi.wi.gov/school-nutrition/procurement/equipment-prior-approval)

Paid Lunch Equity (PLE)

Findings and Corrective Action Needed: Paid Lunch Equity

☐ Finding: The 18-19 SY PLE tool was completed incorrectly. The tool included reduced and adult meals, which impacted the minimum weighted average price requirement. Paid lunch prices should have been set at \$2.75 and \$3.00 to meet a minimum weighted average price of \$2.87. The PLE tool should only include paid student lunches. Technical assistance was provided onsite.

Corrective Action Needed: Correct the 18-19 SY PLE tool and re-upload to the online contract. You have the option to raise prices at semester, or work with DPI in the spring to correctly run and set PLE prices for the 19-20 SY. Submit a statement indicating how the agency will proceed.

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services
 must be covered by revenues received from the sale of those foods. Nonprogram foods may not be
 supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service
 account. Thus nonprogram foods may never run in the negative unless non-federal funds are
 transferred into the food service fund to cover the deficit.
- 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 <u>DPI Nonprogram Food Revenue Tool/Calculator</u> 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).

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

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 has not been completed.

Corrective Action Needed: Watch the Nonprogram Foods Revenue Tool webinar and provide a copy of the completed quiz questions and a completed tool for Barneveld School District using a minimum of a 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).

✓ Finding #2: Improper invoicing system for food service catering. When the food service vendor accounts and resources are used for the purpose of ordering and receiving food for a non-food service event, all cost must be covered. This includes food, labor (ordering, receiving, and prepping) and supplies.

Corrective Action Needed: Modify your process by paying the full vendor invoice out of food service. Food service will then invoice the outside organization for the full cost (food, labor, supplies, etc.) and the check/cash must be deposited as revenue to Fund 50, source 259. **By signing off on this report, the agency agrees to modify their process. No further action required.**

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

<u>Technical Assistance (TA)/Compliance Reminders</u>

Nondiscrimination Statement

When including the <u>non-discrimination statement</u> on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights).

However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, "**This institution is an equal opportunity provider**." Either of these statements must be in the same size font as the other text in the document.

Civil Rights Training

Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

Civil Rights Self-Compliance Form

The Civil Rights Self-Evaluation Compliance form

(https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) is required to be completed by October 31 annually. It is kept onsite and does not need to be submitted to the SNT.

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 <u>prototype Medical Statement</u> 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 <u>special dietary needs</u> can be found on the DPI School Nutrition Team website (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). This <u>flow chart</u> 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.

Fluid Milk Substitutions

- 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 <u>fluid milk substitutes</u>, 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, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI preapproval for use.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within

- 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the USDA Program Discrimination Complaint Form for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

Finding #1: The non-discrimination statement is either missing or incorrectly stated on program
materials.

Corrective Action Required: Update the following resources to reflect the correct non-discrimination statement (as outlined above under Civil Rights technical assistance).

- Free and Reduced Approval/Denial Letter-full statement
- Menu Calendar Report- shortened statement
- Food service website landing page- full statement, or shortened statement with a link to the full the statement

	the statement
Co Pr nu (ht	Finding #2: Civil Rights training was not completed for administrative staff with roles in food service. orrective Action Required: Have the Authorized representative, Determining Official, and Claims eparer review the Civil Rights PowerPoint (https://dpi.wi.gov/sites/default/files/imce/school-trition/ppt/civil-rights-training.pptx) and submit a staff roster sign-off ttps://dpi.wi.gov/sites/default/files/imce/school-nutrition/civil-rights-training-attendance-record.doc/th/date training was complete.
	Finding #3: The PI 1440 Civil Rights Self- Evaluation Compliance Form was not completed. orrective Action Required: Submit the completed form to the consultant.
	Finding #4: A meal benefit color coding system is visible on the point of sale computer screen at the Elementary that may be seen by students and can be seen by staff. This is considered overt

enforce the unpaid meal charge policy. **Corrective Action Required:** Work with Power School and/or your IT department to remove this coding system from the screen. Submit a statement explaining how the situation was corrected.

identification. Per discussion with the Food Service Director, staff do not need this information to

On-site Monitoring

Technical Assistance (TA)/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our <u>Administrative Review</u> webpage under the SFA onsite

monitoring section (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review).

Findings and Corrective Action Needed: Onsite Monitoring

☐ Finding: Onsite monitoring was not completed for the 17-18 SY.

Corrective Action Required: Conduct onsite monitoring for the NSL and SBP at Barneveld El. Submit completed forms to the consultant.

Local Wellness Policy

Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

Content of the Wellness Policy

For assistance in the creation of a LWP, SFAs are encouraged to utilize the <u>Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit</u> (http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit).

The bullet points in bold are missing from the SFA's current policy:

- Policy Leadership- Identify the official responsible for the LWP oversight in the written policy
- Public Involvement- Include language related to permitting the public to participate in the development, implementation, and review
- Language related to foods <u>sold</u> during the school day that adhere to Smart Snacks
- Food and Beverage Marketing
- Goal on Nutrition Promotion
- Triennial Assessment- Include language regarding the completion
- Update/Inform the Public- The written policy must include language specifying how the SFA will be in compliance
- Wisconsin Team Nutrition has several <u>wellness policy resources</u> available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

Findings and Corrective Action Needed: Local Wellness Policy

☐ Finding: SFA LWP meets some but not all requirements.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule.

Smart Snacks in Schools

The review site is in compliance.

Professional Standards

Technical Assistance (TA)/Compliance Reminders

Training Requirements

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, substitute, 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 webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).

Findings and Corrective Action: Professional Standards

☐ **Finding #1:** Reviewer was unable to validate that the food service director has 8 hours of food safety training prior to hire.

Corrective Action Needed: Submit documentation (e.g., ServSafe Certificate or equivalent) to support the food safety hiring standard is met. New directors are required to obtain at least 8 hours of food safety training, either not more than 5 years prior to their starting date or completed within 30 days of their start date.

☐ **Finding #2:** Training is not being monitored on a tracking tool.

Corrective Action Needed: Submit a statement indicating the type of tracking tool that will be used along with a brief list of planned training topics.

Water

The agency is in full compliance.

Food Safety and Storage

Technical Assistance (TA)/Compliance Reminders

Storage

Review SOP #10 Storing Food. Keep all food items on shelves that are at least 6" above the floor to facilitate air circulation and proper cleaning.

Sharing and No Thank You Tables

Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.

Sharing Table

A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

No Thank You Table

A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of

meal service, a designated worker or trained individual must inspect the items for wholesomeness.

Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, prekindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.

Considerations

- 1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
- 2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
- 3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
- 4. Parents will be informed in writing.
- 5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
- 6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
- 7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
- 8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

Wholesome Leftovers

Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. "Wholesome" must be defined by the SFA as part of the SOP.

Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.

Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

Monitoring Log

Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the <u>Food Safety</u> webpage (https://dpi.wi.gov/school-nutrition/food-safety).

Buy American

Comments/Technical Assistance (TA): 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.
- 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.
- There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:
 - Date
 - 2. Name of product
 - 3. Country of origin
 - 4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product e. Distribution- record the reason the distributor carries the non-domestic product
 - e. Other-explain
- You may record additional information if you find it beneficial.
- Many products do not list country or origin or simply have information such as "marketed by" or
 "distributed by," which makes identifying compliance or non-compliance with the Buy American
 provision challenging. If no country of origin is identified on the label, then the 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.
- More information on the Buy American requirement as well as a suggested non-compliant tracking tool template can be found on the <u>Buy American</u> webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).
- Products without country of origin labels should also be tracked or verified through the
 distributor that they are indeed Buy American compliant. TA given onsite. Products without
 country of origin label found onsite:
 - Lite Ranch Dressing
 - French Dressing
 - Herbs and Seasonings (chili, pepper, Italian)
 - Taco filling
 - o Michigan Made kidney and pinto beans
 - Bush's Baked Beans
 - Applesauce
 - Roma tomatoes

Findings and Corrective Action: Buy American

Buy American Finding #1 No Buy American tracking procedure was in place at time of review. Four products were identified as Buy American non-compliant:

• Diced pears, from Thailand

- Pineapple, from the Philippines
- Cucumber, from Canada
- Bananas, from Honduras

Buy American Corrective Action #1: Develop and implement Buy American Non-compliant Product List for tracking non-domestic products that includes all necessary information. *Please provide a copy of the updated form that will be used and include any non-compliant products*.

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

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Breakfast Promotion

Breakfast participation in the Barneveld School District is low compared to participation at lunch. Therefore reviewers discussed promotional ideas to boost participation. The district conducts beginning of the year notifications and reminders throughout the school year, but the service space limits what can be done with the program. The district is in the process of building a new kitchen space, which will present an opportunity to refresh and promote the breakfast program. Staff plan to do a grand opening when the space is completed and highlight breakfast. Administration also mentioned the possibility of a grab and go at breakfast. In addition, the new Food Service director is enthusiastic about participating in School Breakfast week and increasing student engagement.

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 webpage, in the Marketing Breakfast section (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources).

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 Barneveld School District 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 <u>summer meals locator</u> 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 <u>Summer Food</u> website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the <u>interactive map</u> 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: SBP and SFSP Outreach

✓ **Finding #1**: The agency did not conduct Summer Food Service Program outreach.

Corrective Action Needed: By signing this report, the agency agrees to do their part in informing families of where their students can receive free meals in the summer months. **No further action required.**

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program

The agency is in compliance.

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 <u>Every Child a Graduate</u> webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!