USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Black Hawk School Agency Code: 332240

District Review Date(s): February 5-6, 2019

School(s) Reviewed: Black Hawk Middle
School

Date of Exit Conference: February 6, 2019

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 a nominal charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI <u>School Nutrition Training</u> webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI <u>School</u> <u>Nutrition Training webpage</u> (dpi.wi.gov/school-nutrition/training/goal-orientedachievement-learning-skills).
- Wisconsin Team Nutrition is hosting a Teaming Up to Increase Participation workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information

about the workshop is available on the <u>School Nutrition Training</u> webpage (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Black Hawk School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team is confident that Black Hawk School District will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Technical Assistance:

Benefit Issuance

- A Benefit Issuance list contains all students who qualify for free and reduced price meal benefits. The information on this list must include the student name, eligibility status, method of eligibility (app, DC, homeless, etc.), and eligibility approval date.
- The exact day students qualify for meal benefits is the approval date listed on the BI list. This is the first day meal benefits will begin for students who qualify.
- If a household submits an application that indicates Other Source Categorical Eligibility (homeless, migrant, or runaway), the SFA must confirm the student's status by an appropriate program official/liaison either through direct contact with the agency or by a list of names provided by the agency. This must happen before meal benefits can be provided.

Extension of Benefits

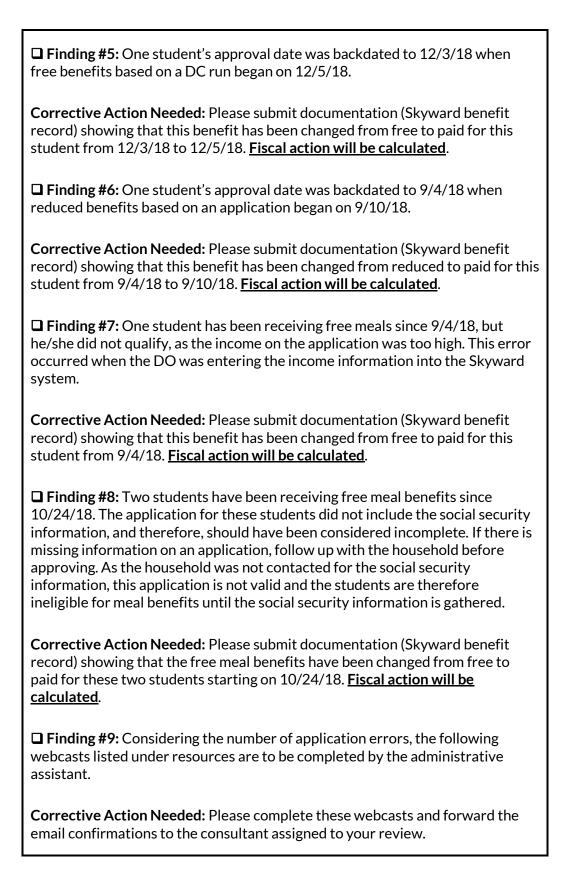
- The Other Source Categorical Eligibility (Homeless, Migrant, Runaway, Foster) is only available to the designated student and is *not* extended to other members of the household.
- Applications that indicate a student is a foster student are categorically eligible for free
 meals. The student's status for free meals does not require confirmation of eligibility prior
 to receiving benefits. This benefit is *not* extended to other household members.
- A student or other household member's receipt of benefits from an Assistance Program automatically **extends** eligibility for free benefits to all student who are members of the household. [7 CFR 245.6(b)(7)]

Compliance Reminders:

Carryover Policy:

- For up to 30 operating days into the new school year (or until a new eligibility determination is made, whichever comes first) an individual child's free or reduced price eligibility status from the previous year will continue within the same LEA.
- When the carryover period ends, unless the household is notified that their children are directly certified or the household submits an application that is approved, the children's meals must be claimed at the paid rate.

Findings and Corrective Action Needed: Certification and Benefit Issuance
☐ Finding #1: Multiple students were found on Direct Certification (DC), thus qualifying the students for free and/or reduced priced meals. DC notification letters were not sent out notifying households with children found on DC to not send in applications. Upon sending in applications, the eligibilities from the applications were taken in place of eligibilities from DC. This resulted in a reduction in benefits for some students.
Corrective Action Needed: Please notify households and rectify this error. Also, ensure DC notification letters will be sent in the future. Corrective action completed prior to on-site review. No further action required.
☐ Finding #2: One student was receiving free meal benefits when his/her benefits should have stopped after the last day of carryover. Beginning 12/19/18, this student qualified for free meals based on an application. However, between the last day of carryover and 12/19/18, this student received free meal benefits for which he/she did not qualify.
Corrective Action Needed: Please submit documentation (Skyward benefit record) showing that this benefit has been changed from free to paid for this student from the last day of carryover to 12/19/18. Fiscal action will be calculated.
☐ Finding #3: One student is receiving free meal benefits when his/her benefits should have stopped after the last day of carryover.
Corrective Action Needed: Please submit documentation (Skyward benefit record) showing that this benefit has been changed from free to paid for this student from the last day of carryover. <u>Fiscal action will be calculated</u> .
☐ Finding #4: One student's approval date was backdated to 10/23/18 when free benefits based on an application began on 12/21/18.
Corrective Action Needed: Please submit documentation (Skyward benefit record) showing that this benefit has been changed from free to paid for this student from 10/23/18 to 12/21/18. Fiscal action will be calculated.



Resources:

- Overview of Determining Eligibility webcast (https://media.dpi.wi.gov/community-nutrition/determining-eligibility-and-verification-overview/story_html5.html)
- <u>Getting Started in F/R Meal Price Eligibility webcast</u> (https://media.dpi.wi.gov/school-nutrition/getting-started-free_reduced-price-meal-eligibility/story_html5.html)
- <u>Processing F/R Applications and Direct Certification webcast</u>
 (https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html)

Verification

Technical Assistance:

- During Verification, the Verifying Official (VO) selects a new application(s) and has the Confirming Official (CO) confirm the original determination of the application *prior* to notifying the household that the application(s) was selected for Verification.
- The VO may be the DO, but the CO cannot be the VO nor the DO.

Findings and Corrective Action Needed: Verification

☐ Finding #10: The Verifying Official (VO) selected and completed Verification for an application for which the student was a foster child. As there was documentation confirming this was a foster child, this application is not subject to Verification. The Verification Collection Report (VCR) will also have to be resubmitted with the results of a new application selected for Verification.

Corrective Action Needed: Please complete the Verification process again with a new, eligible application and submit all documentation to the consultant assigned to your review. Additionally, complete the two DPI Verification webcasts (under *Resources*) and forward the quiz completion email confirmation onto the consultant. Lastly, resubmit the VCR with the new, accurate data to Karrie Isaacson (karrie.isaacson@dpi.wi.gov). If the VCR is completed after March 15, send the results to the consultant assigned to your review.

Resources:

•	DPI	Verification	webcasts:
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- Verification (https://media.dpi.wi.gov/schoolnutrition/verification/story_html5.html)
- <u>Submitting the VCR</u> (https://media.dpi.wi.gov/school-nutrition/submitting-the-verification-collection-report/story.html)
- <u>Verification Packet</u> (https://dpi.wi.gov/sites/default/files/imce/schoolnutrition/doc/verification-forms-packet-1819.docx)

Meal Counting and Claiming

Findings and Corrective Action Needed: Meal Counting and Claiming

☐ Finding #11: Counts are not taken by site at breakfast. All counts are recorded under the elementary site. Counts must be taken by site as this affects DPI reporting.

Corrective Action Needed: Please submit the *Excel* spreadsheet for March's claim for reimbursement to the consultant assigned to your review *prior to* submitting your March claim. Ensure this claim, and all going forward, are *by site* at both breakfast and lunch. Additionally, submit a statement explaining how the breakfast counts will be taken by site in the future.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you for Black Hawk School District's Food Service Director, whose organization and diligence made for an efficient review. The Food Service Director has an excellent grasp of the meal pattern for all age/grade groups. Your willingness to learn and constantly improve is appreciated.

Comments/Technical Assistance/Compliance Reminders

The site reviewed for this Administrative Review was the Middle School, consisting of students in grades 6-8. At a future date, Black Hawk High School may be reviewed and I want to draw attention to the daily alternate entrée of the PBJ that credits as 1 oz eq. grain and 1 oz eq. meat/meat alternate. The Food Service Director is cognizant of the daily and weekly requirements for these two components and plans the menu to incorporate at least an additional 1 oz eq. of grain and meat/meat alternate. Please communicate the meal pattern requirements to the staff person/volunteer at the point of service so they would know that a PBJ does not satisfy the full component for either grains or meat/meat alternate for 9-12 graders.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

☐ Finding #12: The printed menu lists the three milk choices available to students on a daily basis and indicates that the flavored milk is 1%, while it is actually fat-free.

Corrective Action Needed: Please update the printed menu clarifying that the chocolate and strawberry flavored milk is fat-free. Please also add the shortened USDA non-discrimination statement to the Breakfast menu and send a copy of the March 2019 menu to the Public Health Nutritionist.

SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

The Smart Snacks regulation, also known as the All Food Sold in School Rule, governs any food and beverage sold to students during the school day, other than those foods provided as part of the school meal programs.

Please keep in mind that this applies to a la carte items sold to students during the lunch service. Entrees sold to students that were part of the reimbursable meal that day are exempt. Sides and snack items would need to be run through the Smart Snacks calculator (https://foodplanner.healthiergeneration.org/calculator/).

Findings and Corrective Action Needed: Smart Snacks

No findings.

Black Hawk Middle School students do not have access to vending machines, coffee carts, concession stands, or fundraisers during the school day.

BUY AMERICAN PROVISION

<u>Comments/Technical Assistance/Compliance Reminders</u>

The Buy American Provision is a procurement standard that SFAs must comply with when purchasing commercial food products. It requires SFAs to purchase domestically to the maximum extent practicable.

Findings and Corrective Action Needed: Buy American Provision

☐ Finding #13: Upon on-site inspection of pantry and cooler, it was found that canned pineapple is a product of Thailand, fresh red peppers are a product of Mexico and no product of origin in listed for the yogurt.

Corrective Action Needed: Please complete the Noncompliant Product List tracking form for three products and send to the Public Health Nutritionist. They can be found on the Buy American webpage: (https://dpi.wi.gov/school-nutrition/procurement/buy-american)

3. RESOURCE MANAGEMENT

Non-profit School Food Service Account

Technical Assistance:

Annual Financial Report (AFR):

• The AFR is a reflection of the Non-profit School Food Service Account (Fund 50) and must be completed accurately. The revenues and expenditures within the AFR must be reported by program (NSLP, SBP, Non-Program Foods, etc.) and by category (labor, foods, etc.). Reference the resources within this section for more details.

- The beginning and ending fund balances on the AFR *must* match the Fund 50 ledger. The beginning fund balance is July 1 of the current year and the ending fund balance of June 30 of the next year.
- The entitlement value of USDA Foods (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP. Any handling and processing fees must be recorded as a School *Purchased Services* Expenditure.
 - The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our <u>Online Services webpage</u> (dpi.wi.gov/nutrition/online-services).
 - Based on the information provided by the USDA, the School Year (SY) 2019-20
 Wisconsin USDA Foods Annual Order dates have been set as February 11, 2019 February 27, 2019.

Unpaid Meal Charges and Bad Debt

- When local officials determine collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as "bad debt."
- When this uncollectible debt becomes bad debt, it is written off as an operating loss.
- Food service funds may not be used to cover costs related to the bad debt.
- These losses must be restored using non-federal funds such as the school district's general fund, so a transfer must be made into the Nonprofit School Food Service Account to cover the loss.

Compliance Reminders:

 While Black Hawk School District's Fund 50 account maintains a non-profit status, it is looking to save revenues for a future equipment purchase. During this process of saving for an equipment purchase, the SFA will received notice from DPI if the ending fund balance exceeds three months operating costs request the SFA explain how the funds will be spent down. Please contact Karrie Isaacson for more information (karrie.isaacson@dpi.wi.gov).

Finding #14: Currently, non-program foods are not appropriately reported on the AFR. Corrective Action Needed: Formulate procedures for how the Business Manager and Food Service Director will work to ensure non-program foods' revenues and expenditures are accurately reported on the AFR each school year. Submit these procedures to the consultant assigned to your review. Finding #15: Black Hawk School District does not have an Unpaid Meal Charge Policy in place. This policy must be made available to all households in writing at the beginning of the school year to diminish unpaid meals and bad debt.

Corrective Action Needed: Formulate an Unpaid Meal Charge Policy and submit it to the consultant assigned to your review.

☐ **Finding #16**: Fund 50 has been absorbing unpaid meal charges from students. This is unallowable. A transfer into Fund 50 needs to be made.

Corrective Action Needed: Submit documentation illustrating a funds transfer into food service that covers the unpaid meal charges from last school year (17-18). Submit this to the consultant assigned to your review.

Resources:

- DPI SNT's <u>Financial Management webpage</u> (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)
- For more information on unallowable costs related to unpaid meals and bad debt, please see the <u>Unpaid Meal Charges In A Nutshell</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf).
- For more information on allowable expenditures to Fund 50, please see the <u>AFR Expenditure Categories</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc).
- For more information on revenues and expenditures for the AFR, please see the <u>AFR In A Nutshell</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx).
- Utilize the specified <u>WUFAR Codes for Fund 50</u> to make the completion of the AFR simpler (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/wufar_codes_sy1718.xlsx).

Paid Lunch Equity (PLE)

Commendations:

Black Hawk School District's lunch prices are appropriate in accordance with the PLE requirements. Adult meals are also priced accordingly.

Revenue from Non-program Foods

As Black Hawk School District sells non-program foods beyond adult meals and extra milks, a comprehensive review in this area was required. No further action is required.

Technical Assistance:

Non-program Foods are all foods sold to students outside of a reimbursable meal. These
items include a la carte items, adult meals, extra milks, catering, vending machines, and
fundraisers.

• The Non-program Foods Revenue tool is required to assess whether or not Fund 50 is losing funds from non-program foods. This tool is not required if the only non-program foods sold are adult meals and extra milks.

Findings and Corrective Action Needed: Revenue from Non-program Foods

☐ Finding #17: The Non-program Foods Revenue Tool was not completed.

Corrective Action Needed: Please complete this tool from any 5-day reference period in 18-19 school year and submit the tool to the consultant assigned to your review.

Resources:

Non-program Foods Revenue Tool (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx)

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

The And Justice For All poster was publicly displayed in the service area, the public release was completed, and the PI-1441 Civil Rights Self-Compliance form was completed prior to October 31. Thank you!

Compliance Reminders:

- Civil Rights Training is to be completed for all staff working with the programs. Please ensure that all staff involved in the meal programs complete the Civil Rights training annually as well as sign-off on the participation form.
- All program materials and information that is made public (posted, sent to households)
 must contain the USDA Non-Discrimination Statement. There is a shortened version
 available if the longer version does not fit on program materials: This institution is an equal
 opportunity provider.

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.
 Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements.
- School food service staff may make food substitutions, at their discretion, to accommodate student 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.

Findings and Corrective Action Needed: Civil Rights
☐ Finding #18: The LWP does not contain the non-discrimination statement.
Corrective Action Needed : Please update the LWP and send it to the consultant assigned to your review.
☐ Finding #19: The Hearing Official (HO) did not complete the annual Civil Rights training requirement.
Corrective Action Needed : Please have the HO complete the training and sign off on the attendance record. Submit this record onto the consultant assigned to your review.

Resources:

- <u>Special Dietary Needs Medical Statement</u> (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs)
- <u>USDA Non-Discrimination Statement</u> (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights)

On-Site Monitoring

Commendations:

Thank you for completing the on-site monitoring forms for both breakfast and lunch!

Local Wellness Policy

Commendations:

The Local Wellness Policy contained all required components

Technical Assistance:

- A LWP is in place to set the standard for student, school, and community wellness. Develop
 your policy to include specific goals for your school and assess these goals annually to
 ensure your school is promoting local wellness to the best of its ability.
- A LWP committee must be established to annually revise and assess the school's LWP.
 This committee can include anyone from the school and community including students, staff, and parents.

Professional Standards

Commendations:

Thank you for appropriately tracking employee trainings.

Technical Assistance:

- Training requirements have not been met yet this school year, but will be in the coming months.
- Professional Standards training completion and tracking is required for all food service employees. It is recommended that teachers administering WSDMP, paid and volunteer cafeteria aides, and student workers complete job-specific training and annual civil rights training. For more information, please reference the <u>Professional Standards Training</u> <u>Requirement sheet</u> (https://dpi.wi.gov/sites/default/files/imce/schoolnutrition/professional-standards-training-requirements.pdf).
- A program "director" is the person designated to perform or oversee the majority of the program duties (sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management).

Findings and Corrective Action Needed: Professional Standards
☐ Finding #20: Professional Standards trainings are not completed nor are they tracked for the administrative assistant.
Corrective Action Needed: Please submit the completed tracker for the administrative assistant to the consultant assigned to your review.
☐ Finding #21: The Point of Service (POS) staff are responsible for identifying reimbursable meals, but have not gone through proper training.
Corrective Action Needed: Provide documentation to the consultant illustrating the trainings that have been completed after the on-site review for the POS staff.

Resources:

 <u>Professional Standards webpage</u> (https://dpi.wi.gov/school-nutrition/professionalstandards)

Food Safety and Storage

Commendations:

The most recent food safety inspection report was publicly posted and two inspections were received in the prior school year. No storage violations were observed and the kitchen and storage areas were kept in beautiful condition! The food safety plan contained all required components including, employee reporting agreements, processes 1, 2, and 3, and all necessary Standard Operating Procedures (SOPs). Temperature logs are retained on site. The SFA has at least one staff member who has food safety certification. Thank you!

Technical Assistance:

If schools provide meals to students on field trips, a SOP must be in place to explain how
the safety of those meals is handled. Include the SOP in your food safety plan for review
from your food safety inspector.

Reporting and Recordkeeping

Commendations:

All reports were completed, as required. This includes the FNS-10 Report, VCR, PLP Report, and AFR.

Compliance Reminders:

 As a reminder, all documents and information related to the school meals programs must be maintained on file (hard copies or electronically) for a minimum of three years plus the current school year. Temperature logs are to be kept at a minimum of six months.

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

Commendations:

SFSP outreach was completed prior to the end of the academic year. Thank you!

Findings and Corrective Action Needed: SBP and SFSP

☐ Finding #22: The SBP outreach included a menu and prices but did not include language regarding the availability of free and reduced priced meals, nor did it include the non-discrimination statement.

Corrective Action Needed: Please update the SBP outreach to include free and reduced price meal benefit language and the non-discrimination statement.

Resources:

- <u>SFSP Outreach poster</u> (https://dpi.wi.gov/sites/default/files/imce/community-nutrition/doc/Summer%20Food%20Summer%20Fun%20Postcard.docx)
- To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact: Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

[&]quot;The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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 <u>Every Child a Graduate</u> webpage (https://dpi.wi.gov/statesupt/every-child-graduate)."



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