USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Tomahawk School District Agency Code: 35-5754

School(s) Reviewed: Tomahawk Elementary School

Review Date(s): 1/14-15/19 Date of Exit Conference: 1/15/19

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, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI 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 <u>School</u> <u>Nutrition Training</u> webpage (dpi.wi.gov/school-nutrition/training/goal-orientedachievement-learning-skills).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Tomahawk District for the courtesies extended to us during the on-site review. Thank you for being available 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

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

- Of the 433 students eligible for benefits during the month of December, a sample of 260 was reviewed and all benefits were approved correctly. Kudos for a job well done!
- Electronically certified free Foster benefits do not extend to other members of a household.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

The LEA has a regulatory obligation to verify "for cause" all approved applications that may be
questionable, but these verifications are not considered part of the Verification sample. For
more information, refer to the current <u>Eligibility Manual</u>
(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).

Findings and Corrective Action Needed: Verification

☐ Finding #1: The application pool was 31 and the 3% standard sample of 31 equals .93 or 1 application to verify. The SFA verified 2 which considered over verification.

Corrective Action Needed: Please provide a statement that going forward, the correct sample will be verified.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

 Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.

Findings and Corrective Action Needed: Certification and Benefit Issuance

☐ Finding #1: Tomahawk Elementary School checks off 4k and kindergarten students on a check-off sheet in the classroom prior to entering the lunch line and this constitutes an inaccurate point of service because if the student were to become ill, they would need to be removed from the list. The USDA refers to this a back-out system and it is not an acceptable point of service.

Corrective Action Needed: Please correct the process and submit 30 days of clean counts to complete fiscal recalculation for the lunch meals served at Tomahawk Elementary School for the months of September, October, November, and December. There is a \$600.00 disregard before fiscal reclaim is necessary.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations: Meal Pattern

Thank you to all staff at Tomahawk School District for the warm welcomes and cooperation during this Administrative Review (AR). All documentation was sent prior to the review in an organized manner, which greatly expedited the AR. Staff were friendly, easy to work with, understood the regulations well, and had great rapport with students. Signage was well displayed around the cafeteria, many of which promoted local foods and showed students how to select a reimbursable meal. The Food Service Director is doing an exceptional job managing the district's food service operation. They were timely and responsive with submitting documentation. The review site of Tomahawk Elementary School had a perfect week of review for both breakfast and lunch; great job!

Tomahawk School District participates in many farm to school activities such as Harvest of the Month, with posters around the cafeterias; buying local products such as honey, cranberries, apples, and beef; conducting cheese taste tests for the students; and doing hydroponics systems in the classroom. They even used the leaf lettuce grown in the hydroponic structures on the lunch salad bar! Thank you for serving nutritious meals to the students of Tomahawk School District!

Technical Assistance and Program Requirement Reminders: Meal Pattern

Carrots

Currently, carrots are the only red/orange vegetable offered on the menu at breakfast and they are offered daily. Although this is a great vegetable to offer, consider including a variety of red/orange vegetables on the menu (e.g. tomatoes, red peppers, and squash). It is important that students are exposed to a number of different vegetables to create healthy, yet adventurous palettes. For ideas of vegetables and their respective subgroups, use the Vegetable-Subgroups chart (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf).

Standardized Recipes, Taher *Mac and Cheese Recipe*

The Mac and Cheese recipe does not contain the correct grain crediting. The discrepancy is as follows:

- Whole grain (WG) Rotini: 20.40 pounds (326.40 ounces) ÷ 170 servings = 1.92 ounce equivalent (oz eq) (round down to the nearest quarter oz eq) = 1.75 oz eq grain per serving.
- The recipe states 2.0 oz eq grain, which is incorrect based on the calculations above. The WG rotini in this recipe should be increased to provide the desired crediting of 2.0 oz eq grain per serving.

Ham and Cheese Sub Recipe

The ham and cheese sub recipe should be updated to reflect more realistic and practicable practices for staff. Currently, the recipe calls for 1.80 ounces of commodity ham per sub sandwich. When weighed, three slices of ham weighs 1.70 ounces. This means that staff have to cut a quarter of a slice of ham to reach the 1.80 ounces, which is an unrealistic practice especially if a large number of subs must be prepared. Consider updating the ham and cheese sub recipe to include four slices rather than three to ease the burden of tedious preparation.

• Four slices is about 2.20 ounces ÷ 1.22 ounces/oz eq = 1.80 oz eq + 0.5 oz eq (cheese slice) = 2.3 oz eq = 2.25 oz eq grain.

The ham and cheese sub recipe does not contain the correct meat/meat alternate crediting in the directions. It does, however in the ingredients and amounts. See discrepancies below:

- Ingredients and amounts: 5.78 pounds (92.48 ounces) \div 1.22 ounces/oz eq = 75.80 oz eq \div 50 servings = 1.51 oz eq + 0.5 oz eq (cheese slice) = 2.01 oz eq = 2.0 oz eq meat/meat alternate. This has the correct crediting.
- Directions on side: 1.80 ounces ham ÷ 1.22 ounces/oz eq = 1.47 oz eq + 0.5 oz eq (cheese slice) = 1.97 oz eq (round down to the nearest quarter oz eq) = 1.75 oz eq meat/meat alternate. This is the incorrect crediting. This recipe should be updated to reflect the proper amounts for the desired crediting of 2.0 oz eq meat/meat alternate.

Corrective Action: Meal Pattern

There are no meal pattern findings or corrective action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

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

Annual Financial Report (AFR):

All revenues and expenses including food, labor, equipment, purchased services, and other
need to be entered into the program to which they belong. The <u>Annual Financial Report</u>
<u>instructions</u> are located on our website (https://dpi.wi.gov/sites/default/files/imce/schoolnutrition/pdf/annual-financial-report-instructions.pdf).

Allowable Costs

 Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. <u>SP23-2017 Unpaid Meal Charges</u> <u>guidance Q & A</u> may be found our Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the <u>Unpaid Meal Charges In a "Nutshell"</u> (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf). For a more comprehensive overview, see SP 23-2017: <u>Unpaid Meal Charges Guidance</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

☐ Finding #1: The district's unpaid meal charge policy states a second meal may be purchased at a determined price and full bundled second meals are no longer allowed to be sold to students under the Smart Snacks regulation.

Corrective Action Needed: Provide a timeline to update as to when this statement will be removed from your written unpaid meal charge policy.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/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 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.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Processes for complaints

- All SFAs should have procedures 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).
- All verbal or written civil rights complaints regarding the school nutrition programs that are
 filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You
 will want to make sure that this is included in the district procedures to ensure compliance.

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

Content of the Wellness Policy

- The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the Wisconsin Wellness: Putting Policy into Practice School Wellness Policy Toolkit (http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit). At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
 - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)

- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the
 public about the content, implementation of, and updates to the LWP. SFAs must
 complete a triennial assessment to evaluate compliance with the LWP, how the LWP
 compares to model wellness policies, and progress made in attaining the goals of the
 LWP).
- Please refer to the USDA <u>summary of the requirements</u> for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). 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: Wellness Policy

☐ Finding #1: The SFA's LWP does not contain all items on the checklist. The policy states "may" and should state "will" with measurable guidelines. The <u>wellness policy resources</u> from DPI have valuable items such as the Wellness Policy Builder and the Wellness Policy checklist (http://dpi.wi.gov/school-nutrition/wellness-policy).

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

Smart Snacks in Schools

Commendations and Appreciations: Smart Snacks

Tomahawk School District is doing a great job selling compliant a la carte options at all levels and tracking fundraisers. No issues found with the smart snacks section of the review. Great job!

Corrective Action: Smart Snacks

There are no smart snack findings or corrective action.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well.
 The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Authorized Representatives of Food Service Management Company operated SFAs are required to complete 12 hours of continuing education yearly as they function as the Food Service Director in FSMC operated SFAs.
- 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 webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).
- Annual Training Requirements for All Staff

Directors: 12 hours

Authorized Representatives of FSMC operated SFAs 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

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the SNT Food Safety webpage (https://dpi.wi.gov/school-nutrition/food-safety).
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.

Time/Temperature Control for Safety (TCS) Food

- Milk and dairy products
- Shell eggs
- Meat (beef, pork, and lamb)
- Poultry
- Fish
- Shellfish and crustaceans
- Baked potatoes
- Heat-treated plant food, such as cooked rice, beans, and vegetables

- Tofu or other soy protein
- Sprouts and seed sprouts
- Sliced melons
- Cut tomatoes
- Cut leafy greens
- Untreated garlic-and-oil mixtures
- Synthetic ingredients, such as textured soy protein in meat alternatives

Time as Public Health Control

- When using "Time as a Public Health Control:"
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - o There can be no leftovers and no reuse of the items covered under this plan. Thus, if any TCS food is held without mechanical refrigeration or heat during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

Finding #1: Food Safety Plan does not contain site specific Standard Operating Procedures
(SOPs), equipment lists, onsite staff, or all process 1, 2, 3 items. The Process 1, 2, 3 items are
on the door to dry storage, but they need to be in the food safety plan.

Corrective Action Required: Please review your Food Safety Plan and make site specific updates to the plan and submit when complete. An <u>updated prototype</u> may be found on our website (http://dpi.wi.gov/school-nutrition/food-safety#fsp).

Finding #12 There is no SOP for breakfast in the breakfast room for the K4 –first grade
students.

Corrective Action Needed: Please develop a SOP for breakfast outside of the cafeteria and submit updated SOPs as attachment via email.

☐ Finding #3: Because hot items are held outside of mechanical heating and cold items are held outside of mechanical refrigeration at Tomahawk Elementary, Time as a Public Health Control must be used.

Corrective Action Needed: Develop a Time as a Public Health Control SOP and place in school's food safety plan. Submit updated SOP as attachment via email.

Buy American

Commendations and Appreciations: Buy American

Tomahawk School District does a nice job completing Buy American non-compliant forms and keeping them onsite.

Technical Assistance and Program Requirement Reminders: Buy American

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 webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

Corrective Action: Buy American

All documentation was on file for the products found that did not comply with the Buy American Provision. No corrective action required.

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) 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 the 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 <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
 - o 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)
- 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 on the SFSP website (http://www.fns.usda.gov/capacitybuilder).

Findings and Corrective Action: SBP and SFSP Outreach

☐ Finding #1: Summer food service outreach was not provided to students.

Corrective Action Needed: Please provide a statement that you will notify students of the ability to receive free summer meals.

Food Service Management Company

Commendations/Comments/Technical Assistance/Compliance Reminders

Responsibilities which the SFA may "not" delegate to the FSMC.

- Signature authority is the agreement between the SFA and the State agency to participate in
 the Child Nutrition Programs operated, as attested to in the permanent agreement when
 submitting the online contract. Thus, signature authority must remain with the authorized
 representative of the school in the submission of the online contract. This also means that the
 SFA School Food authority must submit the online contract and not FSMC employed food
 service director, so they may actual click the attestation button which serves as electronic
 signature.
- Before the monthly claims are submitted for payment, monthly edit check data must be
 reviewed by comparing daily meal counts to the number of eligible students to make sure
 accurate meals are claimed. Monthly edit checks must be reviewed by the authorized
 representative each month and signature-approved before claim submission, as this is the
 attestation to the claim's accuracy.
- Every school year, each SFA with more than one school site must perform no less than one onsite review of the meal counting and claiming system in each school site operating the National School Lunch Program and 50% of schools operating the School Breakfast Program by February 1.

Other SFA responsibilities, which may, in part, be delegated to the FSMC, but still require oversight:

- Maintain responsibility for the implementation of free and reduced-price policy in accordance with 7 CFR 245. SFA responsibilities include conducting hearings and verifications related to applications for free and reduced-price meals.
- An employee of the FSMC may perform for the SFA various aspects of the application and certification process of eligibility for school meals programs, if a provision for this service is included in the scope of the original solicitation.
- Retain title to all USDA Foods and ensure that all USDA Foods received by the SFA, and made
 available to the FSMC (including processed USDA Foods in processed end products), accrue
 only to the benefit of the SFA's nonprofit school food service and are fully utilized therein. This
 provision also applies to any refunds, rebates, discounts, and credits received from processors.
 The SFA must ensure that the FSMC has credited it for the value of all USDA Foods received
 for use in the meal service in the school year, in accordance with 7 CFR 250.51(a-d).
- Ensure the FSMC maintains applicable health certification(s) and assures that all State and local regulations are being met by the FSMC in preparing or serving meals at a SFA facility.
- Establish and maintain an advisory board composed of parents, teachers, and students to assist in menu planning.
- Develop the 21-day cycle menu for the FSMC request for proposal, unless the SFA is unable to develop a cycle menu, the FSMC may develop the 21-day cycle menu as long as doing so was a requirement of the original solicitation.
- Retain control of the quality, extent, and general nature of the food service and the prices to be charged to the children for meals. This includes retaining control of the nonprofit school

food service account and overall financial responsibility for the programs operated; establishing all prices for all meals served under the nonprofit school food service account (example, pricing for reimbursable meals or non-program foods, such as a la carte foods, and adult meals.)

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