

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Stellar Collegiate, Inc.

Agency Code: 40-8136

School(s) Reviewed: Stellar Collegiate, Inc.

Review Date(s): 12/12/17-12/13/17

Date of Exit Conference: 12/13/17

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. 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](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.usda.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Stellar Collegiate, Inc. for the courtesies extended to us during the on-site review. Thank you for being available to answer questions and provide additional information. The food service director was very receptive to recommendations and guidance and is running a “Stellar” program. 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

Community Eligibility Provision (CEP)

Commendations/Technical Assistance

- Continue to maintain the approval packet for CEP, which support subsequent years’ reimbursements. These certification records must be retained during the entire period the provision is in effect and for three years after submission of the final claim for reimbursement. Additionally, if open audit findings have not been resolved, records must be retained as long as required for the resolution the audit.
- For CEP, the current identified student percentage (ISP) and claiming percentages are approved through the 2019-20 school year. If you would like to continue participation in CEP for another 4-year cycle, the agency will need to re-apply by June 30, 2020. **Run direct certification by school code for the full enrollment on or slightly before April 1, 2020.**
- CEP sites will need to inform the SNT annually of the intent to continue participating, or of any significant changes to participation (i.e. withdrawal or change of participating schools).
- As a reminder, the cost of Alternate Household Income Forms and any labor hours involved with processing/distributing them cannot be paid for from the nonprofit school food service account. Alternate Household Income Forms are not subject to verification, independent review of applications, and the certification and benefit issuance portion of the AR review. They must be kept separate from any USDA meal program records.
- The CEP Household Notification Letter must be sent to households annually at the start of the school year. It was sent on 11/15/17. This letter informs families that the agency participates in CEP and filling out any type of alternate household income form is not contingent on receiving free meals.

Direct Certification

For CEP, you are required to run direct certification at or near the beginning of the school year, for the Special Provisions Match Report. It is also a best practice to run DC for the full enrollment on or slightly before April 1 each year.

Public Release

The public release was sent to local media and nonprofit grassroots organizations as required.

Findings and Corrective Action Needed

No findings. Great job!

Verification

Commendations/Technical Assistance

No findings on the 16-17 SY verification collection report (VCR). Great job! The 1718 SY VCR, which is not due until February 1, 2018 was also completed onsite. Thank you for completing the report early.

Meal Counting and Claiming

Comments/Technical Assistance/Compliance Reminders

- As a CEP site, if Stellar Collegiate has school-aged visiting students, include them in the total count for reimbursement. If claiming, the SFA would not collect payment from the visiting students.
- As a reminder, if a student chooses only milk (declines the reimbursable meal), he/she should be charged for the milk as an a la carte item.
- The popsicle stick and check-off sheet systems, which are used to consolidate the daily/monthly meal counts, are working well.
- The agency will be eligible for an additional 2 cents per lunch of federal reimbursement in the 2018-19 SY. This is automatically added to your monthly claims for serving >60% F/R price lunches in the 2016-17 SY.
- The agency will also be eligible to apply for Severe Need Breakfast reimbursement in the 2018-19 SY. This can be done by electing the Severe Need Breakfast option during the annual online contract submission. For CEP schools, if the Identified Student Percentage (ISP) from the second preceding school year X 1.6 is greater than 40%, the agency qualifies for the additional breakfast reimbursement. Stellar Collegiate's ISP is 82.352% X 1.6 = >100%.

Findings and Corrective Action Needed

- ❑ **Finding:** The breakfast point of sale, once moved to accommodate a few late student arrivals, may not consistently yield accurate counts. While reviewer is confident that the counts were accurate the day of breakfast observation, the system may not be easily transferable when other staff fill the role of the food service director when he is absent. Meals must also be claimed as the student receives the items, not when they are seated/eating.

Corrective Action: Submit a statement to the consultant explaining how the agency will adjust the alternate point of sale, improving internal controls.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the school nutrition staff, including volunteers, and MCFI for providing healthy meals to students at Stellar Collegiate School. All involved were very professional and provided all documentation required in a timely manner and very well organized.

Comments/Technical Assistance/Compliance Reminders

Production Documentation

- Production Records are well organized and easy to understand. Kudos to the food service director for understanding his schools attendance and tracking exact usage at breakfast of products and communicating with the vendor (MCFI) for forecasting. Continuing this practice will help control food waste.
- In order to accurately document the items that were offered as part of the reimbursable meal, items should be recorded by type on the production record (for example, if a variety of muffins are offered, each type should be recorded on a separate line with planned number of servings, actual number prepared, leftover, etc.). This is especially important when different varieties credited differently (such as the pop tarts) or have different dietary specifications. If the same varieties are offered consistently, a recipe may be developed and then the total usage may be recorded instead of by type.
- For future forecasting the Italian meatball sandwich served on 11.07.2017, MCFI sent a certain number of meatballs, 342 meatballs and 3 for each sandwich equaling 114 sandwiches planned for. Amount left over was measured in cups. Best Practice leftover meatballs should be counted to equal how many sandwiches that were discarded.

Crediting Documentation

When planned products change, USDA/commodity foods to vendor supplied, recipes and PFS statements should always be reconciled.

Meal Pattern

K-4 students are allowed to be served the K-5 (- 8 or 12 at breakfast) menu if they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA. This flexibility may be used in situations in which it would be a challenge for staff to determine during meal service if a child is in preschool or K-5. During on-site observation, K-4 students were served the K-8 menu, but were not being served at the same time as the K-5 students. Children who are not yet in kindergarten (K-5) must be served the updated CACFP meal pattern if not co-mingled with other age/grade groups at meals. Training and additional resources can be found on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new [16-17 Annual Financial Report instructions](#) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

As a reminder, the cost of the 2 annual food safety inspections must be reported as a 'purchased service' under the National School Lunch Program.

Allowable Costs

Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](#) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>). As a reminder, WI does not allow indirect cost rates to be applied to the food service account.

Unpaid Meal Charge Policy

This policy *does not* apply to SFA-wide nonpricing agencies, meaning Stellar Collegiate is exempt from this requirement while participating in CEP SFA-wide. If the agency returns to standard counting and claiming, a meal charge policy must be developed.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

None. Great job!

Paid Lunch Equity (PLE)

Stellar Collegiate is exempt from the PLE tool regulations as an SFA-wide non-pricing agency.

Paid Lunch Price Report (PLP)

'N/A' should be reported for any school level (e.g., Middle and High) not offered at Stellar Collegiate. '0' should only be reported for the Elementary level, indicating the agency serves that school level, but does not charge for lunches.

Revenue from Nonprogram Foods

Comments/Technical Assistance/Compliance Reminders

Stellar Collegiate does not sell adult meals or extra milk and is exempt from completing the Nonprogram Food Revenue Tool. Should they need to sell an adult meal in the future, breakfast and lunch are set within the online contract and meeting regulatory minimums.

Adult Meals

At a minimum, SFAs must follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>). SFAs need to reassess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

No findings. Great job!

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Civil Rights Training

- Training was conducted and documented for all nutrition staff. As a reminder, this should be done at the beginning of the school year with other volunteer staff training topics.
- As a reminder, the PI-1441 Civil Rights Compliance Self-Evaluation Form should be kept on file at the SFA and must be completed by October 31 each year.

Special Dietary Needs

At this time, the agency does not have requests for meal accommodations. If there is a future accommodation, make sure the agency is capturing all the necessary information to make a meal accommodation (explanation of how the child's physical or mental impairment restricts their diet, food omissions, and foods to be substituted).

- All food substitutions *made outside of the meal pattern* requirements must be supported by a signed medical statement by a Wisconsin Recognized Licensed Medical Practitioner. A [prototype Medical Statement](#) for Special Dietary Needs is posted on the Special Dietary Needs webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a *licensed medical practitioner*. These meals do not need to meet meal pattern requirements.
- School food service staff may make food substitutions, at their discretion, for children for who do not have a signed medical statement from a licensed medical practitioner. Accommodations made for students without a signed medical statement from a licensed medical practitioner 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.
- For lunch and breakfast (federal programs), 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, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA.
- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow's milk and pre-approved through DPI. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use.

Local Wellness Policy

Commendations:

DPI would like to commend the Stellar Collegiate School on its commitment to child nutrition. The breakfast and lunch periods are extremely well managed and the eating environment is very pleasant. Students are also given an adequate amount of time to enjoy their meals.

Program Reminders:

The Local Wellness Policy (LWP) 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 LWP during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy. At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). USDA Food and Nutrition Service has information on the local school [wellness policy process and wellness policy elements](https://healthymeals.nal.usda.gov/school-wellness-resources) (<https://healthymeals.nal.usda.gov/school-wellness-resources>). Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Technical Assistance:

It is recommended the nutrition education and promotion goals within the LWP be specific and measurable to facilitate a future assessment of the policy.

Corrective Action:

Finding: The LWP did not include sufficient information regarding public involvement and outreach. **Corrective Action Needed:** We ask that the SFA revise their LWP to include language related to permitting the public to participate in LWP development, implementation, and review in the written policy. Upon completion of this revision, please submit the LWP to DPI by the agreed upon corrective action deadline.

Smart Snacks

School currently does not offer Smart Snacks.

Professional Standards

Commendations/Technical Assistance/Compliance Reminders

- DPI appreciates the director's dedication to the food service program. He works hard to ensure the volunteer staff are trained in job specific areas, like food safety and civil rights. The director has over 30 hours of professional standards training between the 1617 SY and the current SY—including a new ServSafe certification.
- As a reminder, all staff, including volunteers should be monitored on a central tracking tool.

Food Safety, Storage, and Buy American

Commendations:

- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all equipment, and food service staff.
- Food safety inspections were completed within the specified required timeframes and posted in a public space.
- The food service director ensures volunteers are aware of all food safety information.

Technical Assistance:

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.
 - **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 during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Buy American

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

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- If no country of origin is identified on label, the SFA must get certification from the distributor or supplier stating: “We certify that “X food item” 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 be accepted within an email.
- Label should indicate if the product is *grown, processed and packed* in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable (e.g., cost, seasonality, availability, substitution, distribution). Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions. The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.

More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed

- ❑ **Finding #1:** The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form.

Bananas- Costa Rica

Broccoli- Mexico

Herbs and Spices- no country of origin

Corrective Action Needed: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A template form is located on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

- ❑ **Finding #2:** The agency is using “Time a Public Health Control” for Time/Temperature Control for Safety (TCS) foods without a standard operating procedure (SOP).

Corrective Action Needed: Develop a site-specific Standard Operating Procedure (SOP) for using Time as a Public Health Control for TCS foods. Train staff on the SOP, keep a copy in the food safety plan, and submit a final copy to the Nutrition Program Consultant. DPI has a couple templates (attached below) that can be modified to meet the needs of the agency. Refer questions on developing the SOP to the local sanitarian who completed the most recent food safety inspection.



SCP Times as
Public Health C...

SCP TC% Times as
Public Health ...

Finding #2: Sanitizer test strip readings are not documented. Per staff, they are taken daily.
Corrective Action Needed: Begin documenting the sanitizer test strip readings. Submit a log with at least 1 week of future readings documented. [DPI's Sanitizer Test Strip Log](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/stsl.doc) may be used/adapted into the electronic Google sheets system (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/stsl.doc>).

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

- School breakfast program participation and outreach exceeded expectations.
- Summer food service outreach was also excellent with multiple avenues of communicating information regarding free meals.

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 your students' success.

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



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