

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Weston School District

Review Date(s): December 5, 2018

School(s) Reviewed: Weston High School

Date of Exit Conference: December 5, 2018

Agency Code: 566354

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, 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 [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, or 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 (USDA) 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 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 Weston 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 appreciates the eagerness of the staff at Weston School District for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, and local wellness policy.

The DPI review team is confident that Weston 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

Commendations:

Direct Certification is run in the required timeframes. All denied and approved applications produced accurate results. Appropriate notification letters and application packets are used.

Technical Assistance:

- Approval of applications should occur in a reasonable amount of time. Preferably within 10 days of receipt of the application. Date stamping at the top of the application is acceptable with prior approval from DPI SNT.
- Household income on applications are to be annualized only if there are multiple forms of income with different frequencies.
- The SFA needs to have the actual application or DC run on file from an outside school district. All names may be blacked out except for the ones being used for the extension of benefits. The date the SFA receives the application or DC run from the outside school district would be the student's eligibility date at the SFA.
 - The Eligibility Manual refers to a letter of approval from the other school district as acceptable documentation; however, Wisconsin requests the meal application as well. This is to ensure that the original application determination from the other district is correct before administering the benefit to the SFA's student.

Compliance Reminders:

- The Confirming and Verifying Officials only need to review and sign applications selected for Verification.

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding #1: Four students' eligibilities were carried over from the previous school year. These students do not qualify for meal benefits in the 18-19 school year, and therefore, the SFA has received more reimbursement than for which it qualified. Fiscal action will be calculated. If it is below \$600 per program, fiscal action will be disregarded.

Corrective Action Needed: Please submit a statement to the consultant assigned to your review detailing how this will be avoided in the future.

Verification

Commendations:

Appropriate household letters are used. Verification was completed by the November 15 due date. Great job following up with household and documenting the SFA's process with dates and signatures. Thank you!

Compliance Reminders:

- As a reminder, *gross* income must be reported on applications and for verification instead of net incomes.
- If benefits increased for students after as a result of verification, the SFA must change the benefit on the BI list within 3 calendar days. If benefits decreased for students after as a result of verification, the SFA must change the benefit on the BI list within 10 calendar days.
- Standard Sampling method is required of SFAs that had a 20% or higher non-response rate in the prior school year's verification process.

Meal Counting and Claiming

Commendations:

The review team is confident in the counting and claiming system of the SFA. The SFA does a wonderful job with breakfast participation! Really great work!

Technical Assistance:

- The SFA utilizes Accuclaims as edit checks. While these Accuclaims produce the information of an edit check, they still must be reviewed and validated prior to submitting claims.
- During the on-site review, it was noted that a consolidated Accuclaim of all three sites produced incorrect numbers. While staff utilized Accuclaims separated by site to report claim numbers, please work to correct the consolidated Accuclaim issue.

Findings and Corrective Action Needed: Meal Counting and Claiming

Finding #2: Adult meals are not counted on Accuclaims. This information is on the monthly meal reports, but they need to be reflected on the Accuclaim.

Corrective Action Needed: Submit the December and January Accuclaims with all adult meals accurately reported to the consultant assigned to your review.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you for communicating with us before we began the on-site Administrative Review; this helps expedite the length of our visit and allows us the ability to offer more technical assistance.

I appreciate your willingness to learn throughout the review process.
The kitchen staff's rapport with the students during meal service was a positive experience. Nice job!

Comments/Technical Assistance/Compliance Reminders

All grains crediting toward the grains component need to be whole grain-rich (WGR). You may determine if a product is WGR by reading the ingredient list and confirming that the first grain ingredient is a whole grain. It is recommended to review the USDA Whole Grain Rice Resource.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

☐ **Finding #3:** During the week of review, there was a vegetable subgroup shortage, specifically legumes. The weekly requirement is ½ cup and the portion size per production records of the baked beans was ¼ cup. That was the only beans/pea/legumes served during the week of review.

Corrective Action Needed: In order to show comprehension of the vegetable subgroup quantity requirements, please send a completed Menu Planning Worksheet for a week of your choice in either December 2018 or January 2019.

☐ **Finding #4:** The wheat Pullman sliced bread and the 2.5. oz pita fold served during the week of review was not whole grain-rich.

Corrective Action Needed: Please submit a new product that will replace the sliced bread and pita fold.

☐ **Finding #5:** Prior to meal service on the day of the review, a meat/meat alternate (M/MA) shortage was found. The scoop size that was planned did not provide the necessary 2 oz by weight to credit the beef crumbles as 2.0 oz eq M/MA. After testing the volume of multiple scoop sizes, kitchen staff found a utensil that will provide 2.0 oz eq of M/MA from the beef crumbles.

Corrective Action Needed: On the Menu Planning Worksheet being sent from a week of your choice in either December 2018 or January 2019 please indicate that scoop size of all meat/meat alternate products to indicate they have been weighed and measured.

SMART SNACKS

Commendations

School food service is a sustainable business and offering Smart Snacks a la carte is a great way to boost revenue for your program. The compliant beverages appeared to be popular with high school students.

Comments/Technical Assistance/Compliance Reminders

In speaking with staff regarding fundraisers, there is one fundraiser that does not meet the All Foods Sold in School rule. Senior classmates are selling candy bars during the school day, although not directly in competition with the National School Lunch Program. This fundraiser could be categorized under one of the two allowable exempt fundraisers by this school group. It was recommended that they track fundraisers using our form and categorize this as exempt.

Findings and Corrective Action Needed: Smart Snacks

No findings.

BUY AMERICAN PROVISION

Commendations

The paperwork on Buy American – Noncompliant products were organized and easily available for our review.

Comments/Technical Assistance/Compliance Reminders

Thank you for being proactive on this regulation and remember to continue to update these forms as you continue to order products outside the USA.

Findings and Corrective Action Needed: Buy American Provision

No findings.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

The SFA does not have a net cash balance exceeding three months average expenditures.

Technical Assistance:

- The cash/entitlement value of USDA donated foods should be reported as a National School Lunch revenue on this report. (This value is found on the Commodity Allocation and Receipt Report or CARS Report in the USDA Foods tab of online services)
- The cash/entitlement value of USDA donated foods should be reported as a National School Lunch food expenditure on this report.
- Purchased Services Expenditures must include processing and handling charges for receiving USDA donated foods as they are considered a payment to the state.

Compliance Reminders:

- 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 [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).

Findings and Corrective Action: Nonprofit Food Service Account

Finding #6: A written Unpaid Meal Charge Policy is not in place. As of July 1, 2017, this policy was required to be in place.

Corrective Action Required: Please submit the policy to the consultant assigned to your review.

Resources:

- [Annual Financial Report webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#afr) (https://dpi.wi.gov/school-nutrition/training/webcasts#afr)
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Paid Lunch Equity (PLE)

Commendations:

PLE tool was accurately completed. Thank you! The PLE survey was completed and the PLE tool was still required to be completed.

Revenue from Non-program Foods

A comprehensive review of non-program foods was completed due to the fact the SFA sells non-program foods beyond extra milks and adult meals.

Compliance Reminders:

- Non-program 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 non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Non-program Food costs and revenues must be separated from Program food costs and revenues.
- The Non-program Revenue Tool must be completed yearly, at a minimum.

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

Finding #7: Non-program food revenues and expenditures are not reported on the Annual Financial Report (AFR).

Corrective Action Needed: Please submit a draft policy to the consultant assigned to your review as to how non-program foods will be accurately tracked and reported on the AFR. More specifically, identify specific titles of the SFA employees in charge of funds from households all the way to the foodservice account into the correct program and expense and revenue categories.

Finding #8: Non-program Foods Revenue Tool was not completed.

Corrective Action Needed: Utilizing a five-day reference period from the past school year, complete the tool and send it to the consultant assigned to your review.

Resources:

- [Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)
- [The Non-program Revenue Tool](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)
- [Non-program Foods webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#nfr) (https://dpi.wi.gov/school-nutrition/training/webcasts#nfr)

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

The SFA completed the annual PI-1441 Civil Rights Compliance Self-Evaluation form and the required annual Civil Rights training was completed for all staff working with the child nutrition programs. The “And Justice For All” poster was displayed in a publically visible location. The SFA also makes efforts to make documents related to the programs available in other languages when needed. Great work!

Technical Assistance:

- Public Releases are required to be sent out prior to the beginning of the school year. Please send them to news outlets, grassroots organizations, employers contemplating layoffs, or anywhere else the public release may be posted.
- Students have another opportunity to eat breakfast during their mid-morning class break in addition to the early morning service. This is allowable as students are only claimed once per program per day. If a student eats at both breakfast services, he or she will only be claimed once and pay a la carte price for the second breakfast.
 - **Please note that withholding meals cannot be used as punishment.** During the on-site observation, less students came to the second service as some were held back from break, when the second breakfast service occurs, as a punishment. While students technically were not kept from breakfast entirely, as all have access to the second service, please keep in mind that some students may not eat breakfast in the first service because they know they will have access later in the day. If this is their time to eat breakfast, but are being held back as punishment, these students will not be fed.
 - **Please consider an alternative form of punishment in place of removing break privileges.** Keeping teachers informed that the students have a second opportunity at breakfast during their break should discourage this time being removed as a punishment. Please consider this so that all students can have the opportunity to eat a healthful breakfast if they missed the first service.

Compliance Reminders:

- The PI-1441 form is to be completed by October 31.
- 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 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.

Findings and Corrective Action Needed: Civil Rights

❑ Finding #9: Student meal prices appear on computer monitors during breakfast service. This is overt identification.

Corrective Action Needed: Please remove the prices from the computer monitor and submit a statement to the consultant assigned to your review with the date this was completed.

Resources:

- [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps)
- [Special Dietary Needs Medical Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs)

On-site Monitoring

Commendations:

Lunch on-site monitoring is completed annually, and breakfast on-site monitoring is completed every other year, as required. As a reminder, breakfast must be reviewing this 18-19 school year.

Technical Assistance:

- Every school year, each SFA with more than one school must perform no less than one on-site review in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
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Local Wellness Policy

Commendations:

The SFA has a completed LWP with all required components. Thank you!

Compliance Reminders:

- The LWP is to be reviewed and revised annually, as needed. A triennial assessment is to be completed every three years with assessment results made available to the public.
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Professional Standards

Commendations:

All foodservice staff have professional standards training trackers completed with the required number of hours.

Technical Assistance:

- Each SFA must designate at least one staff member as a program “director.”
 - 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).
- Professional Standards training tracking is required for all foodservice employees. Volunteers and other staff working with the programs require job-specific training. For more information, please reference the [Professional Standards Training Requirement sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf).
- Annual training hour requirements are as follows:
 - Food Service Director: 12 hours
 - Food Service Manager: 10 hours
 - Full-time Food Service Staff: 6 hours
 - Part-time Food Service Staff: 4 hours

Findings and Corrective Action Needed: Professional Standards

Finding #10: The SFA does not have a designated foodservice director.

Corrective Action Needed: Please submit a statement to the consultant assigned to your review relaying who the foodservice director will be.

Finding #11: One non-reimbursable meal was observed at lunch service. The aids at the POS do not have adequate training on meal pattern and program requirements. As they are

responsible for identifying reimbursable meals, this is particularly important. Fiscal action will be calculated with a \$600 disregard per program.

Corrective Action Needed: Please submit an action plan to the consultant assigned to your review with regards to how the staff will be trained.

Resources:

- [Professional Standards “In a Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf)

Food Safety and Storage

Commendations:

The Food Safety plan was on site and specific to the serving location. Employee Reporting Agreements were completed for appropriate staff members. No storage violations were observed. There is a foodservice employee on staff who has completed ServSafe and obtained a ServSafe certificate. Foodservice employees have an abundance of food safety training. Thank you!

Compliance Reminder:

- Food Safety plans must be reviewed and updated annually.

Reporting and Recordkeeping

Commendations:

Thank you for completing all required reports, including Paid Lunch Price report, Annual Financial Report, and Verification Collection Report. All records are maintained on site for a minimum of the required three years plus the current school year.

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

Commendations:

SBP and SFSP outreach has been completed.

Compliance Reminders:

- The SBP outreach is to be completed before the beginning of the school year in order to encourage participation in the program. The SFSP outreach is to be completed prior to the end of the academic school year to inform households of meals available to their children during the summer months.

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snack Program (ASP)

Commendations:

The Afterschool Snack On-site Monitoring Form was completed. Thank you!

Compliance Reminders:

- An Afterschool Snack Program can participate as "area eligible" if it is located at a school or in the attendance area of a school where at least 50 percent of the enrolled children are eligible for free or reduced price meals.
 - In an Area Eligible Afterschool Snack Program, all participating students are claimed in the free eligibility category when a reimbursable snack is selected. Programs must qualify annually.
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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 Every Child a Graduate webpage](https://dpi.wi.gov/statesupt/every-child-graduate) (<https://dpi.wi.gov/statesupt/every-child-graduate>).



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