# USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Westby Area School Agency Code: 626321

District

Review Date(s): March 19-21, 2018

School(s) Reviewed: Coon Valley Elementary

Date of Exit Conference: March 21, 2018

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, 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 <a href="School Nutrition Training">School Nutrition Training</a> 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 Nutrition Training</u> webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their <u>Healthier School Day: The School Day Just Got Healthier</u> webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- The Smarter Lunchrooms Movement encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

#### Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Westby Area School District for the courtesies extended to us during the onsite review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. The DPI review team appreciates the eagerness of the staff at 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 and meal service. The DPI review team is confident that Westby Area School District will continue to improve their knowledge and operation of the school nutrition programs. Thank you!

## **REVIEW AREAS**

## 1. MEAL ACCESS AND REIMBURSEMENT

## **Certification and Benefit Issuance**

#### **Commendations:**

The SFA did a fantastic job with free and reduced meal applications. Approvals and denials were completed in a timely manner and the benefit issuance list was kept up to date. The staff has a solid understanding of the application process. Great job!

#### Findings and Corrective Action Needed: Certification and Benefit Issuance

☐ Finding #1: The backs of the electronic applications did not have totals calculated or the signature of the determining official. While the reviewer is confident in the knowledge of the staff member as all paper applications were completed correctly, we ask that you please resolve this discrepancy.

**Corrective Action Needed:** Provide a statement explaining your plan going forward to the consultant assigned to your review. Whether that is implementing electronic calculations and signatures, or if this will be done manually.

#### **Verification**

#### **Commendations:**

Great job on the accurate completion of the SFA's Verification Collection Report (VCR). Verification was also completed by the November 15 due date. Thank you!

#### **Technical Assistance:**

• The applications selected for verification were done so through the Standard Sampling Method. While it is acceptable for the SFA to use the Standard Sampling Method, it was not required. Alternate 1 or 2 methods could have been utilized to decrease the number of applications selected for verification.

- Documenting and keeping track of the verification process for each application verified is very helpful for the SFA and the reviewer. Please consider utilizing DPI's <u>Verification Forms</u> to organize your verification process in the future (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx).
- The verifying and hearing officials are the same individual at the SFA. While she is aware of her
  responsibilities, please make sure she is signing and dating each application selected for
  verification.

## **Compliance Reminders:**

- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- The Standard Sampling Method is required if 20% or more of the applications selected for verification in the previous school year had a non-response rate. If the non-response rate was below 20%, Alternate 1 or 2 methods may be used.

## **Meal Counting and Claiming**

#### **Commendations:**

There were no meal counting and claiming issues observed for both the review period and the day of the review. Great job!

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

#### Commendations

Thank you to all staff at Westby Area School District for the warm welcome and cooperative attitude during this Administrative Review (AR). Thank you to the Food Service Director for sending documentation ahead of time in a thorough, organized manner as this greatly expedited the AR process. Great job meeting meal pattern requirements for breakfast with a perfect week of review. The single kitchen staff member at Coon Valley Elementary does a wonderful job preparing and serving meals to students. The salad bar offered a wide variety of fresh fruit and veggies, and even contained beets! Thank you for serving healthy, nutritious meals to the students of Westby.

## **Technical Assistance**

#### **Training**

Anyone involved with the United States Department of Agriculture (USDA) School Meal Programs is encouraged to attend DPI training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free and reduced meal applications, meal pattern, and record keeping requirements. Travel and meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's <u>Training Page</u> (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's <u>Webcast Page</u> (https://dpi.wi.gov/school-nutrition/training/webcasts).

## Child and Adult Care Food Program (CACFP)

The updated CACFP meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the <a href="Infants and Preschool in NSLP and SBP">Infants and Preschool in NSLP and SBP</a> webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool). The new Meal Pattern Charts for the CACFP meal pattern can be found on <a href="USDA's CACFP">USDA's CACFP</a> webpage (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP\_childmealpattern.pdf).

## Offer Versus Serve (OVS) in CACFP

Offer Versus Serve (OVS) is not an appropriate service style for pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are developing food preferences. Instead, pre-K students should be served all the required components in at least the minimum amounts at each meal or, implement family style meal service. When using family style meal service, a sufficient amount of prepared food must be placed on each table to provide the full required portions of each of the food components for all children at the table, and to accommodate supervising adults if they eat with the children. Family style meal service allows children to make choices in selecting foods and the size of initial servings. Children should initially be offered the full required portion of each meal component. Supervising adults should actively encourage (but not force) children to try components and accept full portions during the meal. If a child refuses to take one or more food components, he or she should be offered that food again before the meal is finished. Training resources on family style meals may be found on SNT's Infant and Preschool in NSLP webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

## Milk in CACFP

Milk is a required component to be offered to children when using family style meal service. Small, child-size pitchers are recommended for children to serve milk to themselves. Teachers may serve the milk when using family style meal service, however, children must be served the full serving of milk when doing so. A variety of milk does *not* need to be offered under CACFP and chocolate milk cannot be served.

#### Offer versus Serve (OVS)

Although zero non-reimbursable meals were observed during the day of review, it was unclear if OVS training is done on a consistent basis. It is important that staff understand the OVS requirements so that reimbursable meals are selected by students. Consider watching this OVS Webcast for a quick refresher (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html).

#### **Crediting Documentation**

As a reminder, a Child Nutrition (CN) label or Product Formulation Statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the USDA *Food Buying Guide* for School Meal Programs. Make sure these are kept on file for all applicable products and that they are valid statements. The PFS sent for the Cheese Sauce is invalid as there is missing information required. A PFS needs to clearly detail the ingredients and their creditable quantities in order to be served and credited in School Meal Programs. Be sure all crediting documentation is current and up-to-date. The Raisins are written on production records as 2 oz., yet the USDA Fact Sheet states 1.33 oz. Make sure to have crediting documentation on file that matches the products being used.

#### Crediting

A few menu items were credited incorrectly on production records. Please note there may be a difference between serving size and crediting (or meal pattern contribution). Fruits and vegetables credit by volume served (e.g.  $\frac{1}{2}$  cup peaches credit as  $\frac{1}{2}$  cup fruit) and meat/meat alternate (M/MA) and grains credit by weight (ounce equivalents (oz. eq.)).

- Leafy greens credit as half their volume (e.g. ½ cup Romaine Lettuce credits as ¼ cup dark green vegetable). Therefore, the spring mix on production records should credit ½ cup = ¼ cup dark green vegetable.
- The Turkey with Cheese Sandwich should credit 1.5 oz. eq. Grain, 1.75 oz. eq. M/MA instead of the current 2 oz. eq. grain, 3 oz. eq. M/MA.
  - Grain: 42g ÷ 28g from Group B on Exhibit A = 1.5 oz. eq. grain from bun.
  - M/MA: 2 slices turkey = 1.4 oz. eq. M/MA (round at the end) + 1 slice cheese = 0.5 oz. eq. M/MA = 1.9 oz. eq. (round down to nearest quarter oz. eq.) = 1.75 oz. eq. M/MA from turkey and cheese.
- A California Vegetable Blend without a breakdown from the manufacturer of the amounts of each subgroup will credit towards the "other" vegetable subgroup (unless it contains a starchy vegetable in which case it will credit toward "additional" vegetables for the week). Currently, the California Vegetable Blend, which contains carrots, cauliflower, and broccoli, is written on production records as: serving size (½ cup), with ¼ cup red/orange, ¼ cup other, and ¼ cup dark green breakdowns. This information has not been provided by the manufacturer and therefore cannot be credited toward those individual subgroups. The three, ¼ cup increments also adds up to ¾ cup vegetable, which is more than the ½ cup serving size. Without a breakdown from the manufacturer, the veggie blend with credit ½ cup = ½ cup "other" vegetable.

Refer to the <u>Food Buying Guide</u> (FBG) for more details on how specific ingredients credit toward the meal pattern (https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

#### **Production Records**

Production records are intended to be useful tools to record information prior to production, during production, and following production. The breakfast production record template currently in use has missing information, such as planned and prepared number of purchase units.

Be specific on production records about the identity, brand, and description of the items served. Instead of "fresh fruit" or "canned fruit", list exactly what was served. Keep in mind that "1 fruit" as a

serving size for the generic "fresh fruit" or "canned fruit" is not appropriate as some fruits credit differently (e.g. in general, bananas credit as ½ cup fruit and apples credit as 1 cup fruit).

While there is no required production record template, there are some examples that may be used on our <u>Production Records</u> webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). A copy of the production record requirements ("Must Haves and Nice to Haves" list) can also be found at that link.

## Multiple Entree Options, Meeting Daily and Weekly Requirements

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line (or entree) needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. This includes the alternate daily option as well as the main line.

#### **Equipment Grants**

The United States Department of Agriculture (USDA) distributes funding annually to State Agencies (SAs) to award equipment assistance grants to eligible School Food Authority's (SFA's) participating in the National School Lunch Program (NSLP). Priority for this grant will be given to schools that have not received similar USDA equipment grants in the past and have 50% or higher free and reduced-price eligibility. Requested equipment must cost more than the SFA's definition of capitalization threshold or \$5,000, whichever is less. More information can be found on the Equipment Grant Opportunities webpage (https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant).

#### **Corrective Action**

**Finding #2:** There was a weekly grain shortage with the alternate meal of PB&J and cheese stick (2.0 oz. eq. M/MA, 1.0 oz. eq. grain). Although this meets the daily grain requirements, this will not meet the weekly (5 oz. eq. grain offered; 8.0 oz. eq. grain required weekly for grades K-5).

**Corrective Action Needed:** Please state what you will do to the alternate menu option so that the weekly grain requirements are met for K-5.

**Finding #3:** Food products and ingredients used to prepare school lunches must contain zero grams of trans fat per serving (less than 0.5 grams per serving) according to each product's nutrition label or manufacturer's specifications. If it is likely that trans fat appearing on a label is naturally occurring, the SFA must request documentation from the manufacturer that reports the source of the trans fat prior to continuing use of the product. All products containing synthetic trans fats must be discontinued immediately. The European Margarine/Butter Blend contains 3.5 grams of trans fat.

**Corrective Action Needed:** Please submit a nutrition facts label for a new margarine/butter blend that contains 0 grams trans fat.

Finding #4: No CN label was provided for the Chicken Strips.

**Corrective Action Needed:** Please provide a CN label from the box for the Chicken Strips.

**Finding #5:** Signage was not posted at breakfast or lunch to show students what constitutes a reimbursable meal. Signage is especially helpful when students are self-serving foods, such as lettuce on the garden bar. It may be helpful to post a picture of a tray with the amount of lettuce (or other vegetables) that the menu planner expects the students to take. Signage examples can be found on our <u>Signage Resources</u> webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/signage).

**Corrective Action Needed:** Please submit a picture of breakfast and lunch signage posted near the line showing what is offered as part of a reimbursable meal.

## 3. RESOURCE MANAGEMENT

## **Nonprofit School Food Service Account**

#### **Commendations:**

The SFA did a great job on the Annual Financial Report (AFR)! It is obvious the staff has a strong knowledge base of the Nonprofit School Food Service Account.

## **Paid Lunch Equity (PLE)**

#### **Commendations:**

The PLE tool was completed accurately. Great job!

#### Revenue from Non-program Foods

Due to non-program foods - other than just adult meals and extra milks - being sold at the SFA, a comprehensive review was required to be completed during the onsite administrative review.

#### **Compliance Reminders:**

- Non-program foods include: Adult Meals, A la Carte items, 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.

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

☐ **Finding #6**: The SFA did not complete the required Non-program Foods Revenue Tool (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-

food-price-calculator.xlsx). This tool must be completed annually at a minimum and may be completed using a 5-day reference period.

**Corrective Action Needed**: Please complete the tool by the corrective action deadline and provide a copy to the consultant assigned to your review.

## **Indirect Costs**

#### **Commendations:**

Indirect costs were not found during the onsite administrative review. Good work!

## 4. GENERAL PROGRAM COMPLIANCE

## **Civil Rights**

#### **Commendations:**

The Civil Rights required annual training was completed by all foodservice staff. Great work!

Findings and Corrective Action Needed: Civil Rights
☐ Finding #7: An updated version of the "And Justice For All" poster was not hung up in a publicly visible location.
<b>Corrective Action Needed</b> : Please send along a photo of the poster hanging up outside the kitchen and within the serving area to the consultant assigned to your review.
☐ Finding #8: The outdated, shortened non-discrimination statement was on foodservice menus. Additionally, the full non-discrimination statement was not on any school webpages containing information regarding the school nutrition programs.
Corrective Action Needed: Please send updated menus with the most current, shortened non-discrimination statement to the consultant assigned to your review. Additionally, please include either the full non-discrimination statement or a web link to it on all webpages containing information related to the school nutrition programs.
☐ Finding #9: The Civil Rights Compliance Self-Evaluation (PI-1441) was not completed by the annual October 31 deadline.

**Corrective Action Needed**: Please complete the PI-1441 form and send it to the consultant assigned to your review.

#### **Resources:**

- As of December 4, 2015, the most current, full <u>non-discrimination statement</u> has been changed (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/snt-mail-120415.docx).
- The most current, shortened non-discrimination statement is as follows: "This institution is an equal opportunity provider"

## **On-site Monitoring**

## **Compliance Reminders:**

• By February 1 of each school year, on-site monitoring is required to be completed at all sites participating in the National School Lunch Program (NSLP), and half of the sites participating in the School Breakfast Program (SBP).

#### Findings and Corrective Action Needed: Onsite Monitoring

☐ **Finding #10:** On-site monitoring forms were completed for neither the NSLP nor the SBP.

**Corrective Action Required:** Please complete all required forms and send them to the consultant assigned to your review.

Additional Corrective Action: If any corrective actions are found during the on-site monitoring, please complete the corrective actions within 45 days of the initial on-site assessment, and send this along to the consultant.

#### **Resources:**

- The <u>NSLP on-site monitoring form</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-onsite-monitoring.doc)
- The <u>SBP on-site monitoring form</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc)

#### **Local Wellness Policy (LWP)**

#### **Technical Assistance:**

• The SFA receives its LWP through Neola. It may be beneficial and less time-consuming to utilize the Local Wellness Policy Builder in order to create your own updated LWP.

## Findings and Corrective Action Needed: Local Wellness Policy (LWP)

☐ Finding #11: Westby Area School District's LWP did not address the requirements for the following components: public involvement, school meals, foods sold outside of school meals programs, foods provided but not sold, food and beverage marketing, nutrition education, nutrition promotion, and the triennial assessment.

**Corrective Action Needed:** Please send the updated LWP to the consultant assigned to your review.

#### **Resources:**

- <u>Local Wellness Policy Checklist</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf)
- <u>Local Wellness Policy Builder</u> (https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLy N0CRD8SteFNmyA/viewform?c=0&w=1)

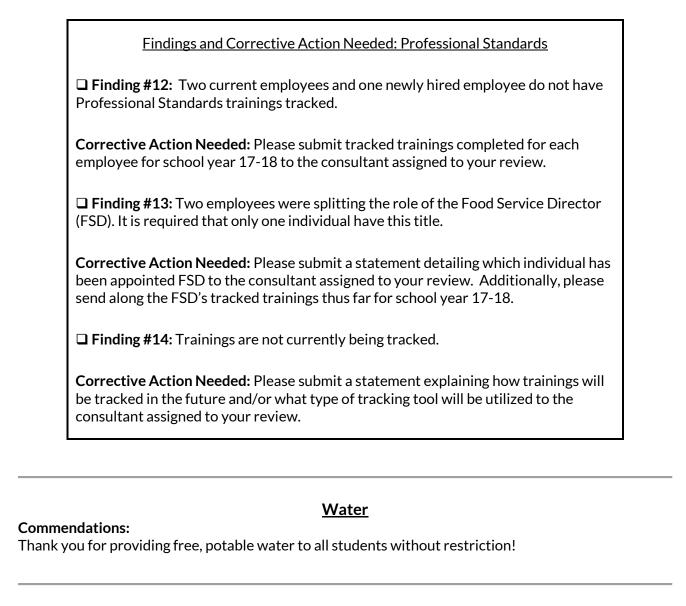
## **Smart Snacks in Schools**

Smart Snacks are not currently sold at the SFA.

#### **Professional Standards**

#### **Compliance Reminders:**

- The Annual Training Requirements for All Staff:
  - Directors: 12 hoursManagers: 10 hours
  - Other Staff (20 hours or more per week): 6 hours
  - o Part Time Staff (under 20 hours per week): 4 hours
  - o If hired January 1 or later, only half of the training hours are required during the first school year of employment.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- 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
   such as sanitation, food safety, nutrition and menu planning, food production, procurement,
   financial management, record keeping, customer service, nutrition education, and general dayto-day program management.
- The SFA should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged.



# **Food Safety and Storage**

#### **Commendations:**

No storage violations at Coon Valley Elementary School were observed during the onsite review. Additionally, the Food Safety Plan was site-specific and contained all required elements. Kudos on your "Time as a Public Health Control" Standard Operating Procedure (SOP)!

#### **Technical Assistance:**

• The Food Safety Plan was not yet updated this school year. The Food Safety Plan must be reviewed and updated accordingly on an annual basis.

Findings and Corrective Action Needed: Food Safety and Storage

☐ Finding #15: Employee Reporting Agreements were not completed for staff
working in the food preparation and service areas.
Corrective Action Needed: Corrected onsite.
☐ <b>Finding #16:</b> The most recent food safety inspection was not posted in a publicly visible location.
Corrective Action Needed: Corrected onsite.
Buy American
Commendations:
No products were found that violate the Buy American Provision.
Compliance Reminders:
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 or packed in the U.S, but the countr of origin is not listed, this product requires the distributor's certification.
More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT <u>Procurement</u> webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).
Reporting and Recordkeeping  Commendations:

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

All records were kept for the required three years plus the current year. Thank you!

**Technical Assistance:** 

• Although the SFA does not provide summer meals, it should inform eligibly families of the availability and location of SFSP meals before the end of the academic school year.

#### **Compliance Reminders:**

 At the beginning of each school year, when free and reduced price meal applications are sent to households, the SFA must notify families of the availability of the SBP. In addition, schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

## 5. OTHER FEDERAL PROGRAMS REVIEWS

## Wisconsin School Day Milk Program (WSDMP)

#### **Commendations:**

The milk served to students is Wisconsin-Produced. Thank you!

## Findings and Corrective Action Needed: WSDMP

☐ Finding #17: Milk counts were taken by teachers using an electronic system. As teachers observed students taking milks, they un-checked students that were either absent and/or not taking a milk that day. Students must be checked off as they receive their milks, not un-checked if they did not receive a milk.

**Corrective Action Needed:** Please provide a statement of understanding to the consultant assigned to your review and any communications with teachers regarding this change. This statement should include what changes were made to the WSDMP point of service procedures.

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 (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!