

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Lac du Flambeau School District **Agency Code:** 63-1848

School(s) Reviewed: Lac du Flambeau

Review Date(s): 2/20-21/19

Date of Exit Conference: 2/21/19

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](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).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff Lac du Flambeau School 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

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals every school day (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning). Field trip meals must be charged to the student at the time of delivery of the reimbursable meal. If students do not come to cafeteria to pick up field trip meals, they must be checked off as the student receives the meal.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #1:** The prepackaged grab-and-go Breakfast's served had the milk and the other ½ cup of fruit past the Point of Service, constituting an inaccurate Point of Service.
Corrective Action Needed: Please correct the breakfast point of service and submit 30 days of clean counts to complete fiscal recalculation for the breakfast meals served for the months of, December, January, and February.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations/Comments/Technical Assistance/Compliance Reminders

Thank you to all staff at Lac du Flambeau Public School for the warm welcome and cooperation during this Administrative Review (AR). The Food Service Staff has been a pleasure to work with, always helpful and receptive to suggestions. The food service department is doing a nice job offering a variety of fruit and vegetables, including multiple entree options. Everyone was welcoming, friendly, and easy to work with, worked well with each other, and interacted well with students and other school staff.

Training Opportunities

- Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (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/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage, under Upcoming Trainings (https://dpi.wi.gov/school-nutrition/training#up).
- Regular trainings are also offered on the School Nutrition Team webpage on the DPI website as [webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts), webinars, and on-site trainings (https://dpi.wi.gov/school-nutrition/training/webcasts).
- Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](https://dpi.wi.gov/school-nutrition/directory) can be found on our website (https://dpi.wi.gov/school-nutrition/directory)

Grants

- [Grant opportunities](https://dpi.wi.gov/school-nutrition/grant-opportunities) are continuously updated on the Wisconsin Department of Public Instruction (DPI) School Nutrition Team webpage (dpi.wi.gov/school-nutrition/grant-opportunities). Information on the [NSLP Equipment Assistance Grant](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) can be found on the same page, beneath the Equipment Grants heading (dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant). Check these web pages regularly for upcoming grant opportunities, of which you can take advantage!

Documentation

- Any processed product that is not listed in the USDA *Food Buying Guide* for Child Nutrition Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to credit toward the meal pattern. A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for Child Nutrition Programs, it may not be credited when served as part of the USDA School Meal Programs. Additionally, remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

Production Records

- Documentation, including production records must be kept for all food items offered to students during the meal service. All foods offered to students must be included in the daily and weekly nutrient analysis. During meal service observation the nutrition bar was fully stocked with healthy options for the students. According to [The School Day Just Got Healthier Fact Sheet: Calories in School Meals](https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf), there are no specific maximums for fruits or vegetables (<https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf>). Schools may allow greater amounts than the required minimums by offering self-service or allowing seconds servings of fruits and vegetables. Additional offerings do count towards the weekly calories limits, but because fruits and vegetables are generally lower in calories, they can be excellent sources for satisfying meals and sustaining energy.
- USDA policy memorandum [SP 41-2014](https://fns-prod.azureedge.net/sites/default/files/cn/SP41-2014os.pdf) also states that with time-limited lunch periods and increased amount of fruits and vegetables offered as part of the meals, some students may be inclined to save some items for consumption at a later time (<https://fns-prod.azureedge.net/sites/default/files/cn/SP41-2014os.pdf>). There is no federal prohibition of this practice, and Food and Nutrition Services (FNS) encourages it as a means of reducing potential food waste and encouraging consumption of healthy school meals. For food safety concerns, this practice should be limited to only food items that do not require cooling or heating, such whole fruit, cereal, or packaged crackers.

Juice

- No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. It is possible to offer juice daily and still meet the 50 percent juice limit as long as it is offered along with fruit (fresh, frozen, dried, or canned). Multiple students were observed taking three juices at breakfast. Use caution when determining if students can select duplicate juice cups with meals. SP 10-2012, Questions and Answers on the Final Rule defines an “offering” of fruits or vegetables for the purposes of assessing the juice limit, as “the amount a child is able to select at a given meal, regardless of the number of options/variety of fruits or vegetables. The total amount of juice available at all meals over the course of the week (separately for lunch and breakfast) is then divided by this total fruit offering to determine the weekly juice offering. No more than half of the total fruit offering may be in the form of juice.”
- When analyzing the juice limit, consider the total amount of fruit students are able to select each day and how much juice to which they have access.

Signage

- The fruits and vegetables on the garden bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. [Salad Bar Signage Template](#) can be found on our [Signage](#) webpage, under the heading Additional Signage Resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>; <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Finding #1: The weekly juice limit at breakfast exceeded 50 percent of the total fruit offering. A total of 10 cups of fruit (which includes whole fruit and juice) were offered over the course of the week, with 7 ½ cups of that as juice. This means 75.0% juice was offered over the course of the week, which exceeds to 50% juice limit.

Corrective Action Needed: In a written detailed statement, state what will be done to the week of review and going forward, so that no more than 50% of fruit offerings are in the form of juice at breakfast over the course of the week.

Finding #2: Missing documentation. The extra cold bar must have crediting documentation and production records.

Corrective Action Needed: Submit to the PHN a week's worth of production records and all crediting documentation for the nutrition bar. To match your cycle menu, as the PHN already has this week, send week 6 breakfast records and week 1 lunch records.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for this week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action. Thank you.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

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 [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>).
- Because of the Nonprogram Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all recorded in Purchased Services.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

Finding #1: On the Annual Financial Report, all of the revenues and expenses were not broken out by category and most were recorded in Purchased Services.

Corrective Action Needed: Please submit a manual 17-18 Annual Financial Report and a statement that going forward all expenses will be broken out by category.

- ❑ **Finding #2:** Catering and other nonprogram foods are not converted to meal equivalents as there is no meal equivalent price on their FSMC contract.

Corrective Action Needed: Please submit a statement that the 19-20 renewal of the district's FSMC contract, will have all nonprogram foods converted to meal equivalencies and be billed thusly.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- For fixed price per meal contracts, awarded on a per meal basis and with revenues from nonprogram foods sales converted into meal equivalents to which the fixed price cost is applied, the FSMC will annually provide information on food costs and revenues. The information must include food cost for reimbursable meals, food cost for non-program foods, revenue from non-program foods, and total revenue. Nonprogram foods include: a la carte; catering; vending; and student stores operated, or any other sales generated through the nonprofit school food service account not already described. This information is used to determine compliance with revenue from nonprogram foods at 7 CFR 201.14(f).

4. GENERAL PROGRAM COMPLIANCE

Local Wellness Policy

Comments/Technical Assistance/Compliance Reminders

- Lac du Flambeau has an excellent wellness policy that meets all of the requirements!

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you to the staff of Lac du Flambeau for having one of the vending machines in the front entry way turned off during the school day (midnight to half an hour after the last educational period has ended) and the second vending machine stocked with water and available to anyone entering your facility.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety

- SFAs are required to have site-specific food safety plans 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.
 - **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.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Because cold items are held outside of mechanical refrigeration, Time as a Public Health Control must be used.
Corrective Action Needed: Develop a Time as a Public Health Control SOP and place in all school’s food safety plans who implement the process. Submit updated SOPs as attachment via email.
- ❑ **Finding #2:** Standard operating procedures (SOPs) for Breakfast in the Classroom and Fresh Fruit and Vegetable Program are not included in the food safety plan.
Corrective Action Needed: Add and adapt site-specific Breakfast in the Classroom and Fresh Fruit and Vegetable Program SOPs to the food safety plan. Submit updated SOPs as attachments via email.

Buy American

- The USDA requires that an 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.

- **All Buy American provisions are being followed! Nice job!**

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program

Commendations/Comments/Technical Assistance/Compliance Reminders

- Per the Agreement in the points, the SFA agrees to, number 3 States schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid.

Afterschool Snacks

Commendations/Comments/Technical Assistance/Compliance Reminders

- Recommend sourcing 6 oz. juice rather than giving students two 4 oz. juices.

Fresh Fruit and Vegetable Program

Commendations/Comments

Off-site Claim Validation:

- Lac du Flambeau has participated in the FFVP since the beginning of the program in WI
- Claims are always submitted promptly
- FFVP snacks are served 4-5 times per week, significantly more than the required minimum 2 times.
- FFVP snacks contain a great variety of fruits and vegetables

Technical Assistance/Compliance Reminders

- Reviewer did notice WG chips and crackers on the FFVP invoice and FFVP Charge Ticket from FSMC. These non-allowable FFVP food items were not included on the October claim and in further discussion with coordinator, they are not served on days when FFVP snacks are served. Reminded coordinator that these non-program foods cannot be paid with FFVP funds or with Fund 50 and must be paid for with non-program funds.
- FFVP must be publicized throughout the school and the school.

Carolyn Stanford Taylor Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. Her 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).

