

# Administrative Review Report

Neillsville School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/14/2023	03/31/2023
On-Site Review	04/04/2023	04/06/2023
Site Selection Worksheet	02/14/2023	02/14/2023
Entrance Conference	04/04/2023	04/04/2023
Exit Conference	04/06/2023	04/06/2023

## Commendations:

Thank you for completing the questionnaire and uploading documents into SNACS prior to our onsite visit. We appreciate your availability during our onsite visit to review documentation and answer questions.

From the Public Health Nutritionist: Thank you to all the staff at Neillsville SD for the warm welcome and cooperation during Neillsville's Administrative Review (AR). Thank you to the FSD for being available during the on-site portion of the review, and helping us to gather the needed documentation and information prior to our visit. Thank you for your organized recordkeeping of production records, crediting information, standardized recipes, and Buy American tracking documentation. Thank you for serving healthy, nutritious meals to your students!

## Recommendations:

No Recommendations found for this review.

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	700	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/05/2023 10:55 AM</p>	<p>Finding 1: The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The SFA is not aware of what the funds can be spent on, and the funds are not being tracked separately.</p> <p>CA: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent. It is recommended the SFA utilize the <a href="#">Supply Chain Assistance (SCA) Funds Expense Tracker</a>.</p> <p>Finding 2: The 2021-22 Annual Financial Reports beginning balance does not match ending balance of previous year and/or the ending balance does not match the PI 1505 (public schools).</p> <p>CA 2: Update the 2021-22 Annual Financial Report (AFR) and ensure the beginning balance matches the ending balance of the previous school year. Upload a copy of the updated report into SNACS. Once approved, the report will need to be updated in the Online Services portal. The DPI accountant will make any adjustments after December 31. It is recommended that the SFA watch the <a href="#">AFR Webcast</a> and read the <a href="#">AFR Instruction Manual</a>.</p>
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	701	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/05/2023 10:55 AM</p>	<p>Finding: Based on the SY 2021-22 Annual Financial Report, the nonprofit school food service account has a net cash resource in excess of 3 months average expenditures. The SFA does not have an approved spend down plan from the State Agency (7 CFR 210.9(a)).</p> <p>CA: Submit a plan and timeline for reducing the net cash resources to below 3 months operating expenditures. Please note, a formal notification and report may also be required outside of the AR process.</p>
<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	711	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	<p>Flagged 04/05/2023 11:00 AM</p>	<p>Finding: Teacher salads are not priced sufficiently according to FNS Instruction 782-Rev.1 CA 1: Teacher salads should be charged the adult meal price as listed in the approved 2022-23 school nutrition contract. CA 2: Notify SFA staff and update prices by the corrective action due date. CA 3: Upload a copy of the communication sent to staff into SNACS.</p>
	<p>CAP Submitted 04/05/2023 12:55 PM</p>	<p>Moving forward staff will be paying full meal price for all meals/salads taken.</p>
<b>Site Name</b>		

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<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	805	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/06/2023 10:16 AM</p>	<p>Finding: Chiropractors do not meet the definition of a Practitioner to sign a dietary accommodation form by Wisconsin Statute 118.29(1)(e): "Practitioner" means any physician, dentist, optometrist, physician assistant, advanced practice nurse prescriber, or podiatrist that is a State Licensed Medical Authority. CA 1: Continue providing the accommodation until the household provides an updated medical statement signed by a Practitioner in Wisconsin. The SFA may provide the household a deadline, then re-evaluate for the remainder of the school year. CA 2: Require a corrected statement from the household before making the accommodation next SY. SFAs are not required to accommodate dietary requests unless a signed medical statement by a practitioner is on file.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 03/23/2023 01:58 PM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (school meals, foods provided but not sold &amp; triennial assessment). (7 CFR 210.31). CA: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	135	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	<p>Flagged 04/05/2023 11:54 AM</p> <p>CAP Submitted 04/05/2023 03:43 PM</p>	<p>Finding: The SFA did not retain direct certification (DC) match runs on file at the SFA, either electronically or hard copy (7 CFR 245.6). CA: Provide a statement describing how the SFA will retain DC files for the required timeframe. Moving forward the SFA will make sure that all required DC matches will be have a hard copy kept on file immediately after doing the run. These matches will be kept for 3 years plus the current school year.</p>
<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	140	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/06/2023 10:37 AM</p>	<p>Finding: The eligibility start date listed on the BI list did not correlate with the date of the DC run. Although no BI errors were found, students with a carryover benefit from the prior school year that matched in the beginning of the 2022-23 school</p>

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		year on DC had a start date of 10/15, which was the carryover end date. CA: Submit a statement of understanding that the eligibility start date is always the date a new determination is made either through a DC match or application.
<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	141	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/06/2023 10:48 AM	Finding: All reviewed students are receiving the correct extension benefit. However, the eligibility start date for students receiving an extension benefit makes it unclear whether they were extended the benefit in a timely manner from the qualifying student's DC match date (July-September). CA 1: Provide a process that the SFA will use to identify and extend meal eligibility to all members of the household who are eligible in a timely manner. CA 2: Submit a statement of understanding that students in a shared household will receive an extension benefit if another household member matches with S, O, M, or Z code on DC in a timely manner.
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	207	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/06/2023 10:58 AM	Finding: Income documentation from the second parent is not on file to complete verification for the selected household. CA 1: Notify the household and provide them 10 days to supply the income documentation to support the original application (reduced) or reapply with current income documentation if the household believed they may qualify for free. CA 2: Complete verification based on the household's response. Review the income documentation and determine if the household retains their benefit, increases, or loses their benefit. CA 3: If the household does not respond after 10 days, provide them with the <a href="#">adverse action letter</a> and revert them to paid status after 10 days.
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	208	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/04/2023 10:09 AM	Finding: SFA did not complete a confirmation review before verifying application(s). CA: Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	209	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		

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<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/05/2023 12:07 PM	Finding: Applications selected for verification were not verified correctly (7 CFR 245.6a). CA: Have the verifying official watch the " <a href="#">Verification Process</a> " <a href="#">webcast</a> on the DPI website and upload a copy of the completed quiz into SNACS.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/05/2023 11:17 AM	Finding 1: The correct <a href="#">non-discrimination statement</a> was not included on all program materials (unpaid meal charge policy) CA: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated. Finding 2: The non-discrimination statement was not included on all required program materials (local wellness policy). CA: Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS.
<b>Site Name</b>	Neillsville High School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	Flagged 04/05/2023 12:00 PM	Finding: During the week of review, the daily and weekly minimum requirement for the Grain component was not met for grades 9-12 for lunch with the alternate entrée option of the Chef Salad. The current recipe for the Chef Salad includes 1 Dinner Roll. The crediting information for the Baker Boy Honey Wheat Roll indicates 1 roll credits as 1.25 oz eq grain. The daily minimum requirement for 9-12 is 2 oz eq grain. The weekly minimum requirement for 9-12 is 10 oz eq grain.  Corrective Action: Describe specifically how the daily minimum requirement for the Grain component will be met with the alternate entrée option of the Chef Salad during the week of review. If you are updating the recipe for the Chef Salad, please submit the updated standardized recipe.
	CAP Submitted 04/05/2023 03:44 PM	The SFA will be offering 2 dinner rolls with the Chef Salad moving forward.
<b>Site Name</b>	Neillsville High School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	430	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/06/2023 09:18 AM	Finding: Production records on file for the week of review were missing required information. Breakfast Production Records during the week of review were not consistently filled in with the following: <ul style="list-style-type: none"> <li>Menu item with recipe name/reference number or product name/description. Be specific about the identity, brand, portion size, and description of all items served.</li> <li>Planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb. case, 2-96 count case)</li> </ul> The Grab & Go Lunch Production Records during the week of review were not consistently filled in with the following required information:

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	<ul style="list-style-type: none"> <li>Fruit Component: Planned serving size</li> <li>Planned/actual quantity prepared in purchase units</li> </ul> <p>Corrective Action: Submit one full week of completed production records for breakfast and lunch (both the Cafeteria and Grab &amp; Go area), including all production record requirement information recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
<b>Site Name</b>	Neillsville High School
<b>Form Name</b>	Smart Snacks (1104 - 1107)
<b>Question #</b>	1105
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	CAP Submitted
<b>Corrective Action History</b>	<p>Flagged</p> <p>04/05/2023 11:57 AM</p> <p>Finding: The French Fries sold for a la carte purchase are not Smart Snacks compliant. A product must first meet one of the general standards: be whole grain-rich, have a fruit, vegetable, dairy product, or protein food as the first ingredient, or be a combination food with at least 1/4 cup fruit and/or vegetable. The first ingredient in this product is potato, therefore, it does meet the Smart Snacks general standard, but it does not meet dietary specifications. Snacks sold a la carte must contain less than 200 calories and contain less than 200 mg of sodium per serving. The serving size of the French Fries sold a la carte was 1 cup, which provides 220 calories and 560 mg of sodium. Therefore, it exceeded both the calorie and the sodium limits.</p> <p>Corrective Action: Please submit a written statement indicating how you will comply with the Smart Snacks regulation (e.g. discontinue selling the French Fries, portion size decrease, product replacement, etc.).</p>
	<p>CAP Submitted</p> <p>04/05/2023 12:54 PM</p> <p>We will no longer allow students to have a 2nd order of French Fries</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
04/05/2023	3372		Administrative Review		FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
Training: Webcasts and self-guided e-learning courses are available in the Online Learning Library ( <a href="https://dpi.wi.gov/school-nutrition/training/online-learning">https://dpi.wi.gov/school-nutrition/training/online-learning</a> ). Check our Training webpage for additional training opportunities ( <a href="https://dpi.wi.gov/school-nutrition/training">https://dpi.wi.gov/school-nutrition/training</a> ). 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 can be found on our website ( <a href="https://dpi.wi.gov/school-nutrition/directory">https://dpi.wi.gov/school-nutrition/directory</a> ).								4/5/2023 12:11:47 PM
04/05/2023	3369	404	Administrative Review	Neillsville High School	FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
Signage: Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least 1/2 cup fruit and/or vegetable, or a combination. Current signage in front of the hot vegetable and fruit in the cafeteria line states "Must take to have a complete meal." However, students may choose to take fruit and/or vegetable offerings off of the salad bar to build a reimbursable meal. Please update your current signage to include the correct verbiage and post in a visible location near the beginning of the serving line. Signage examples can be found on our Signage webpage ( <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage</a> ).								4/5/2023 12:07:52 PM
04/05/2023	3396		Administrative Review		FSD			

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Comments						Created By	Created Date
Excellent follow up with ensuring the correct meals are claimed by category. Work with your software company to ensure the correct number of meals by eligibility status is reported on the edit check.							4/6/2023 11:00:58 AM
04/05/2023	3389		Administrative Review		FSD		
Comments						Created By	Created Date
Standardized Recipes/Crediting: Multiple recipes do not contain accurate meal pattern contribution information based on the current products being used, and therefore meal pattern contribution on the production records are not accurate. Please update the following recipes and crediting information listed on the Grab & Go Production Records:							4/6/2023 9:26:15 AM
<ul style="list-style-type: none"> <li>• Chef Salad: Provides 1.25 oz eq grain (See Finding #410 regarding the daily grain shortage and update recipe/PR as appropriate)</li> <li>• Buffalo Chicken Wrap: Recipe provides 4.5 oz eq grain</li> <li>• Grilled Chicken Wrap: Recipe provides 3.5 oz eq grain</li> <li>• Breaded Chicken Wrap: Recipe provides 2.5 oz eq M/MA and 4.5 oz eq grain</li> </ul>							
The following have accurate crediting information listed on their recipe, but the Grab & Go Production Records need updated to reflect the following:							
<ul style="list-style-type: none"> <li>• Hamburger: Recipe provides 2.75 oz eq M/MA</li> <li>• Cheeseburger: Recipe provides 3.75 oz eq M/MA</li> </ul>							
Continue to work on updating your standardized recipes and production records to accurately reflect the products that are being used in the kitchen.							
04/05/2023	3388		Administrative Review		FSD		
Comments						Created By	Created Date
Offer Versus Serve (OVS)/ Grab & Go Lunch: The school is doing a great job offering a variety of food items that meet meal pattern requirements at the Grab & Go Station, however current entrée offerings are paired with 1 cup of fruit and/or vegetable to ensure a complete meal. The 1 cup of fruit and/or vegetable paired with these entrees is currently chosen by staff. Students do have the option to select additional fruit and/or a side salad from the salad bar, as well as a milk variety option. To fully utilize Offer Versus Serve (OVS), it is recommended that you allow students to self-select which 3 of the 5 components (including a 1/2 cup fruit and/or vegetable) they would like with their meal. Signage can help teach students how to select a reimbursable meal, and staff at the point of service would need to verify each meal meets the requirements for a reimbursable meal.							4/6/2023 9:22:43 AM
04/05/2023	3387		Administrative Review		FSD		
Comments						Created By	Created Date
Offer Versus Serve (OVS)/ Breakfast: Although all students observed took a reimbursable meal, it is important for staff to understand the OVS requirements. Some students were sent back to take an additional fruit and made to take more than what they needed at breakfast. OVS resources on WI DPI's Menu Planning webpage ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/offer-versus-serve">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/offer-versus-serve</a> ) may be used as training resources.							4/6/2023 9:21:13 AM
04/05/2023	3386	400	Administrative Review	Neillsville High School	FSD		
Comments						Created By	Created Date
Production Records: Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf</a> ).							4/6/2023 9:19:47 AM
04/04/2023	3364		Administrative Review		FSD		
Comments						Created By	Created Date
Child Nutrition Program participants must be advised at the point of service of their right to file a complaint and the complaint procedures. To meet this requirement, the USDA And Justice for All poster must be placed in a prominent, visible location wherever meals or							4/4/2023 2:14:46 PM

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snacks are served. This location may include a cafeteria, food service area, or classroom. It is recommended to move or add the AJFA poster to the grab and go station.								
04/04/2023	3363		Administrative Review		FSD			
<b>Comments</b>								
					<b>Created By</b>	<b>Created Date</b>		
Excellent job promoting the SBP in the beginning of the school year. Best practice is to promote the SBP throughout the school year. For example, promote the SBP at the beginning of the second semester or quarterly. Consider strategies available on the <a href="#">SNT Marketing Your Program Webpage</a> .						4/4/2023 2:12:56 PM		
04/04/2023	3362		Administrative Review		FSD			
<b>Comments</b>								
					<b>Created By</b>	<b>Created Date</b>		
The public release must be provided to the local news media, unemployment office, and any major employers contemplating large layoffs in the attendance area of the school (7CFR 245.5). It is recommended to distribute the public release to multiple local grassroots organizations such as a local food pantry.						4/4/2023 2:11:35 PM		
04/04/2023	3361		Administrative Review		FSD			
<b>Comments</b>								
					<b>Created By</b>	<b>Created Date</b>		
The SFA was unable to produce the actual "we must check" and "we have checked" verification letters sent to the household. The template letters uploaded in SNACS are correct. Please ensure that a copy of the letter provided on file is maintained for your records for 3 years plus the current.						4/4/2023 2:07:23 PM		
04/04/2023	3371		Administrative Review		FSD			
<b>Comments</b>								
					<b>Created By</b>	<b>Created Date</b>		
Condiment Usage: Condiment portion sizes are not communicated to students, but portion sizes are recorded on the production records. Please communicate appropriate portion sizes of all condiments to students, as condiments can be a significant source of calories, saturated fat, and sodium. Promote appropriate serving sizes by adding signage at the condiment stations and/or photos of the planned portion size of the condiments.						4/5/2023 12:11:15 PM		
04/04/2023	3370		Administrative Review		FSD			
<b>Comments</b>								
					<b>Created By</b>	<b>Created Date</b>		
Sodium: Sodium Target 1 was mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 and is currently in effect with Interim Target 1A taking effect for the school year 2023-2024. All foods and condiments must be taken into account when calculating the dietary specifications (calories, saturated fat, trans fat, and sodium) over the course of the week. It was observed at the Grab & Go condiment station that salt packets were available to students. The Food Service Director immediately corrected this by taking the salt packets away from the condiment station, since this was not included as part of the planned menu and would not fit within the dietary specification limits.						4/5/2023 12:10:13 PM		