

Administrative Review Report
163297 Maple School District

Review Schedule	Start Date	End Date
Off-Site Review	01/24/2019	04/08/2019
On-Site Review	05/07/2019	05/09/2019
Site Selection (130) Northwestern Elementary School		
Entrance Conference		05/07/2019
Exit Conference		05/08/2019
Corrective Action Deadline		July 3, 2019

Commendations:

Maple School District has a close-knit food service team. Staff collaborate well to ensure households are certified for meal and milk benefits in a timely manner and are served nutritious meals that reduce food insecurity and help students learn. The food service director has years of valuable experience and was open to reviewer feedback.

Informative blurbs are posted in the back-to-school newsletter, which is sent to all households communicating the local unpaid meal charge policy and wellness policy.

Free and Reduced-Price Certification and Benefit Issuance and Verification

The determining official (DO) does an excellent job processing applications as evidenced by a very low error rate. Determinations are made when the application is unambiguous and complete. Receipt date stamping ensures applications are approved in a timely manner. The DO takes advantage of DPI SNT training resources, both online and in person. She is in contact with State agency consultants to receive guidance and apply best practices. Keep up the good work!

Direct Certification runs are completed within the required timeframes and more often to ensure students are automatically matching to meal benefits. This practice improves meal access and minimizes unpaid meal charges.

The verification process and verification collection report (VCR) were completed perfectly.

Counting and Claiming

The monthly NSLP and SBP/SBP-SN claim consolidation process is perfect. The claiming official maintains clear, well-organized software reports and account coding to ensure meal reimbursements are allowable and payments are reconciled. The annual WSDMP claim consolidation process is a model for other SFAs. Keep up the good work!

Comments:

The SFA utilized the SY 18-19 Paid Lunch Equity (PLE) flexibility.

Administrative Review Report
163297 Maple School District

Findings and Corrective Action:	
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Corrective Action	<p>Finding: The SY 17-18 Annual Financial Report (AFR) does not separate <i>Nonprogram</i> Food Revenue and Expenses from <i>Program</i> revenues and expenses.</p> <p>CA: Submit a statement explaining how Nonprogram revenues and expenditures will be reported separate from Program revenues and expenditures on the SY18-19 AFR and moving forward.</p> <p><i>Nonprogram Food Sales: Adult lunch and breakfast meals, a la carte milk, extra entrees/sides, caterings, paid WSDMP milks, vending sales that are purchased using food service funds, etc.</i></p> <p><i>Program Sales: NSLP, SBP/SNB, WSDMP (F+ R milks).</i></p>
Form Name	Revenue From Non-Program Foods (709 - 711)
Corrective Action	<p>Finding: SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p>CA: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5-day reference period from the current school year. Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing.</p>
Form Name	Civil Rights (800 - 807)
Corrective Action	<p>Finding: The correct shortened non-discrimination statement (NDS) was not included on the menu calendar overview, which is posted and sent to households.</p> <p>CA: Update program materials to include the correct non-discrimination statement, which is: "This institution is an equal opportunity provider." The current materials say, employer vs. provider. The NDS must be exact. Upload a copy of the corrected menu into SNACS under the documents tab.</p>
Form Name	Civil Rights (800 - 807)
Corrective Action	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p>CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action. Upload the document in SNACS.</p>
Form Name	Local School Wellness (1000 - 1006)

Administrative Review Report
163297 Maple School District

Corrective Action	<p>Finding: Current LWP does not include all of the required content areas. The policy is missing language related to: Foods Sold Outside the School Meal Programs (Smart Snacks); Foods Provided but not Sold; Food and Beverage Marketing, Nutrition Promotion, and Specifying how the SFA will update and inform the public about the content and policy implementation.</p> <p>CA: 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. Refer to the LWP Checklist (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) for an at-a-glance of required minimum content areas.</p> <p style="background-color: yellow;">Corrected onsite. No further action required.</p>
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Corrective Action	<p>Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).</p> <p>CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Corrective Action	<p>253 free and reduced price meal application determinations were reviewed, 3 errors were identified.</p> <p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). The households meal benefits were incorrectly calculated. See the SFA-1 provided by the consultant for details.</p> <p>CA: Notify the household of the correct meal benefit, per program requirements. Upload a copy of the adverse action letter sent to the household and documentation that the benefit issuance list has been updated into SNACS.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Corrective Action	<p>Finding: The DC notification of eligibility letter does not explain how the household can notify the SFA if they do not wish to receive free or reduced benefits. Consider using the DPI template, which is updated annually and can be copied into Skyward. This will ensure notification requirements are met.</p> <p>CA: Update the SFAs DC notification letter template to</p>

Administrative Review Report
163297 Maple School District

	include the missing information. Upload into SNACS under the documents tab.
Form Name	Certification and Benefit Issuance (124 - 142)
Corrective Action	<p>Finding: The SFA is not in compliance with nondiscrimination practices per 7 CFR 245.8. The following was found during the audit:</p> <ol style="list-style-type: none"> 1. Overt identification of students' eligibility for meal benefits at the review site during meal observation. The point of service (POS) screen shows current purchase price (\$0, \$0.40, \$2.60). 2. Local officials have access to meal eligibility data for the purpose of waiving local fees and do not have disclosure agreements on file. 3. Local fees (e.g., athletic, drama, dance) are waived or discounted based on F/R status without prior parental consent as evidenced by the software <i>Fees Paid Report</i> and lack of a sharing of information form. <p>CA: Provide a statement on how the SFA will correct the overt identification of students with meal benefits in each area outlined above. Continue to work with your software vendor to restrict permissions in the software system to only those that "need to know". Submit copies of the local official disclosure agreements.</p>
Form Name	Professional Standards (1210 - 1219)
Corrective Action	<p>Finding: The school nutrition program staff did not complete the required training hours for the current school year and was unable to provide a training plan for the current school year (7 CFR 210.30).</p> <p>CA: Review the School Nutrition Team Professional Standards webpage for annual training requirements for school food service staff. Provide a training plan for how each staff member that is not in compliance will meet the required training hours for the 18-19 school year. Identify how the SFA will maintain a central tracking tool for all staff working with the food service program (e.g., shared Google doc, DPI Excel tracker, USDA Web-based Tool, word doc, etc.).</p>
Form Name	Professional Standards (1210 - 1219)
Corrective Action	<p>Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive USDA civil rights training in the current school year (7 CFR 210.30 (d)(6)).</p> <p>CA: Complete civil rights training for the current school year,</p>

Administrative Review Report
163297 Maple School District

	<p>for all non-school nutrition staff, with school nutrition program responsibilities. The PowerPoint (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx) can be viewed online. Submit the attendance record (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/civil-rights-training-attendance-record.doc) with name and date of completion. Upload the record in SNACS under the documents tab.</p>
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Corrective Action	<p>Finding: The lunch meal counting and claiming system at Northwestern El does not result in accurate meal counts by eligibility (7 CFR 210.7) <u>for the Daycare and 4K classes</u>. Meal counts were not taken as the student received their reimbursable meal. Meal counts cannot be based on forecast or attendance.</p> <p>CA: Correct the meal counting process to ensure meals are tracked as the student receives their meal. Retrain food service and teaching staff involved with the point of service count. Submit a statement explaining how and when the system was corrected. Submit a staff attendance record under the documents tab in SNACS.</p>
Form Name	Meal Components and Quantities - Review Period (409a)
Corrective Action	<p>Finding: Missing meal component. Friday April 5, 2019 the Maple School District scheduled an early release day. The nutrition professionals at Northwestern Elementary School prepacked bagged lunch for students based on the production records provided by the food service director. Bagged lunches did not contain the required vegetable component.</p> <p>CA: Please send the PHN a detailed statement of how this will be avoided in the future, webinars watched, SNSDC classes the nutrition professionals and the FSD are registered for, and any other documents (example: an early release lunch form, similar to a field trip form that families can indicate what they would like in the bag).</p> <p><i>Fiscal Action: 268 non-reimbursable meals were served at Northwestern Elementary School on April 5, 2019 due to missing vegetable component.</i></p>
Form Name	Meal Components and Quantities – Standardized Recipes (409b)
Corrective Action	<p>Finding: Recipes currently in use not standardized to the Northwest Elementary School.</p>

Administrative Review Report
163297 Maple School District

	<p>CA: Please submit to the PHN standardized recipes for the following recipes:</p> <hr/> <ul style="list-style-type: none"> • All Sandwich Recipes • Sloppy Joe Recipes • Taco Meat including instruction “how to create” Taco in a Bag for/with students • Caesar Salad <hr/>
Form Name	Meal Components and Quantities - Offer versus Serve (500)
Corrective Action	<p>Finding: If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, on early release days as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types.</p> <p>CA: Please submit to the PHN a statement of understanding and a detailed explanation of how all students will be offered meal components to create a reimbursable meal, regardless of the meal service style (examples include early release, field trips, and grab-n-go).</p>
Form Name	Special Dietary Needs- Milk (403b)
Corrective Action	<p>Finding: Food Service Director (FSD) is offering juice in place of milk at lunch to students with completed Special Dietary Needs forms. The FSD could not say for sure if a medical practitioner actually specified juice as the beverage to substitute for milk.</p> <p>CA: Please provide a detail procedure, indicating who will follow up with the nurse and the parents. Also indicate what other allowable milk types will be offered to students who may need it.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Corrective Action	<p>Finding: The most recent (Spring, 2019) food safety inspection report at the review site was not posted in a publicly visible location.</p> <p>CA: Provide a photo showing the most recent (Spring, 2019) food safety inspection report is posted and visible to the public.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Corrective Action	<p>Finding: Each site must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with the what is outlined in the site specific SOPs at Northwestern El:</p>

Administrative Review Report
163297 Maple School District

	<ol style="list-style-type: none"> 1. SOP #5, pg. 21 Using and Calibrating Food Thermometers. Per local procedure, thermometers should be calibrated and the reading recorded on the production record 1x/week. 2. SOP #21, pg. 43 #2. Cleaning and Sanitizing Food Contact Surfaces. Take and record the dish machine temperature results on a log. 3. Missing SOP and log for Use of Milk Bags: Monitoring Temperature Option. <p>CA: Retrain staff so that practices align with the findings under number 1 and 2. Obtain and train on number 3. Submit a statement describing how practices were adjusted. Include a staff rosters with the date training was completed.</p>
Form Name	Wisconsin School Day Milk Program (WSDMP)
Corrective Action	<p>Finding: The SFA is providing and claiming <u>4 oz.</u> of 100% full-strength juice for those with medical statements documenting a milk allergy/intolerance or other condition that prohibits the consumption of cow's milk.</p> <p>CA: Provide <u>8 oz.</u> of 100% full strength juice and claim the cost of 8 oz. juice. Submit a statement in SNACS (respond under the CA tab) agreeing to modify your practice beginning in the 19-20 SY.</p>
Form Name	Wisconsin School Day Milk Program (WSDMP)
Corrective Action	<p>Finding: Inaccurate point of sale. Milk counts are based on A.M. forecast rather than actual participation as the student receives the milk.</p> <p>CA: Submit an explanation outlining how the point of sale will be corrected. Retrain all staff who manage the point of sale. Submit a roster documenting when training was completed and who attended.</p>
Technical Assistance:	
Unpaid Meal Charges	
FNS recommends keeping low or negative account balances confidential to minimize student distress and embarrassment. Direct communications to the adult in the household privately (and ahead of time) via mail, phone, or email. If low balance reminders and/or F/RP applications are sent home with the student, communicate this in a discrete manner (e.g. white paper and envelope). Consider re-evaluating current practices and centralizing communications to through the Determining Official (DO) and/or Food Service Director (FSD).	
Food Safety Plan – Annual Review	
The site-specific food safety plan should be reviewed annually. Document this update clearly within the plan.	
Wisconsin School Day Milk Program (WSDMP)- Daycare and Early childhood	
Maple SD may offer the Daycare (Tigers Den) and Early Childhood access to the WSDMP. Both groups have access to NSLP and SBP. They are located in the elementary building and are operated by the District.	

Currently the Daycare is rationing milk from the NSLP meal service to save for the P.M. snack. This is unallowable. The 1/2 pint of milk from NSLP is for lunch. Another 1/2 pint milk can be offered for P.M. snack as a non-program food sale or by offering access to the WSDMP.

Onsite Monitoring (SBP and NSLP)

Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1. The onsite monitoring forms are found on our Administrative Review webpage.

Civil Rights

If an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the USDA Program Discrimination Complaint Form for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. You will want to make sure that this is included in the district procedures to ensure compliance.

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. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- 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.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, **but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable.** SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Allergen "Aware" Table

The SFA has a peanut "free" table. This practice is at the SFAs discretion. Consider stating that the school and table are peanut "aware" rather than "free" as this may present a false sense of security for parents and students. The SFA cannot possibly check every food item brought into the school. However, standard operating procedures can be implemented to properly clean the school environment and reduce risk of cross contact.

For example, continue to discourage food sharing and encourage hand washing before and after eating. For more information see the CDC Tool kit, "[Managing Food Allergies in Schools](https://www.cdc.gov/healthyschools/foodallergies/toolkit.htm)" (<https://www.cdc.gov/healthyschools/foodallergies/toolkit.htm>).

Refunds

See the [SNT Financial Q&A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>) for more information on unpaid meal charges and refunds. When any student leaves the district or graduates, SFAs must attempt to contact the household to return any funds remaining in the account. Currently, there is no approved flexibility to set a dollar amount threshold (e.g., \$10) that the SFA will not attempt to refund. Funds left unclaimed cannot be used to offset another student's negative account, unless paid households have chosen to donate those funds.

Verification

Verification was completed on 11/16/18. As a reminder, Verification must be completed by November 15th. In the case of a non-response, ensure the adverse action letter is mailed by this date to meet the deadline.

Local Wellness Policy (LWP)-Triennial Assessment

The first triennial assessment will need to be completed in SY 20-21. The assessment includes two parts:
1) Measuring the extent to which the SFA is in compliance with the policy goals/objectives and;
2) How the SFAs policy compares to a model policy.
To complete part 1, consider completing the [Report Card](http://goo.gl/forms/9WY5IJbrL0) (<http://goo.gl/forms/9WY5IJbrL0>).
To complete part 2, consider using the [WellSAT](http://www.wellsat.org/default.aspx) (<http://www.wellsat.org/default.aspx>).

"The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>)."



With School Nutrition Programs!