

Administrative Review Report

Oakfield School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/30/2023	12/08/2023
On-Site Review	12/19/2023	12/20/2023
Site Selection Worksheet	10/30/2023	11/10/2023
Entrance Conference	12/19/2023	12/19/2023
Exit Conference	12/20/2023	12/20/2023

Commendations:

Our sincere thanks to the administration and school nutrition staff of the Oakfield School District. We appreciate the time and effort spent preparing for and participating in the administrative review process. Thank you for your availability during the on-site portion of the review and helping the DPI review team to gather the needed documentation and information. Thank you for what you do for kids!

For information on the USDA Child Nutrition Programs, visit the [DPI School Nutrition webpage](https://dpi.wi.gov/school-nutrition) (https://dpi.wi.gov/school-nutrition). For in-depth technical assistance, including program links see the 2023-24 General Program Reminders which has been uploaded to the documents tab in SNACS.

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT offers School Nutrition Summer Training online and in various locations around the state. Find more information on these training opportunities on the [DPI School Nutrition Training webpage](https://dpi.wi.gov/school-nutrition/training) (https://dpi.wi.gov/school-nutrition/training).

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Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged 12/14/2023 11:26 AM</p>	<p>Finding: The SFA does not track and account for all revenues and expenditures for the nonprofit school food service account by program and expense category (7 CFR 210.19). SFA needs to track all revenue and all expenses by program for 7/1-6/30 year. Purchased services are only: <ol style="list-style-type: none"> 1. Pest Control 2. Garbage/recycling (for nutrition programs) 3. Printing/copying (for nutrition programs) 4. Training costs (fees, mileage, lodging) 5. Equipment repair costs 6. Food Service Management Company management fees and profit 7. Fees expended for professional/technical services (e.g., accountants, legal advice, outside consultants, computer specialists) 8. Utilities (must be identified or metered to Food Service fund) 9. Laundry service 10. Employee travel 11. Food safety inspection fees Corrective Action: Review the Annual Financial Report webcast or manual on the DPI website. Submit a statement on how the revenues and expenditures will be tracked separately for the nonprofit school food service account going forward</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged 12/20/2023 10:20 AM</p>	<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. Corrective Action 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5-day reference period from the current school year.</p>

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		Corrective Action 2: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	Flagged 12/19/2023 08:29 PM	Finding: The Public Release was not distributed to the required locations including the media, local unemployment office, grassroots organizations and any major employers contemplating large layoffs in the area (7 CFR 245.5(a)(2)). Corrective Action: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	Flagged 12/14/2023 11:50 AM	Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). Corrective Action: Utilizing the DPI template policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA and upload into SNACS.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	Flagged 12/19/2023 03:52 PM	Finding: Civil Rights training documentation was not available to support that this training was provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1). Corrective Action: Provide the civil rights training to (HS cook, FSD and 2 ES custodians) that interact with program applicants; the training is located here:

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		https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html). Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>12/14/2023 12:02 PM</p>	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p>Corrective Action: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>12/14/2023 12:04 PM</p>	<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>Corrective Action: 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>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>12/19/2023 08:05 PM</p>	<p>153 free and reduced-price meal application determinations were reviewed, 11 errors were identified.</p> <p>Finding 1: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected.</p>

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		<p>Corrective Action 1: Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS.</p> <p>Finding 2: 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>Corrective Action 2: Notify the household of the correct meal benefit, per program requirements. Upload a copy of the letter to the household and documentation that the benefit issuance list has been updated into SNACS.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	130	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>12/19/2023 01:49 PM</p>	<p>Finding: The SFA did not provide proper written notification to each household denied free or reduced-price meal benefits (7 CFR 245.6).</p> <p>Corrective Action: Provide a statement of understanding that all denied households must be notified in writing with proper notice and upload to SNACS.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>12/19/2023 01:59 PM</p>	<p>Finding: SFA did not complete a confirmation review before verifying application(s).</p> <p>Corrective Action: 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.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	215	
TA Log #	No TA Log# found	

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Due Date		
Corrective Action History	<p>Flagged 12/19/2023 02:02 PM</p>	<p>Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a).</p> <p>Corrective Action: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/19/2023 08:35 PM</p>	<p>Finding: The correct non-discrimination statement was not included on all program materials. (updated NDS needed on #8531, the LWP, the meal application approval letter and the food service webpage referencing food service prices and applications).</p> <p>Corrective Action: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged 12/19/2023 08:54 PM</p>	<p>Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p>Corrective Action: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action History	Flagged 12/19/2023 09:06 PM	<p>Finding: Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13). Plan missing 3 employee reporting agreements (HS cook, FSD and FSW).</p> <p>Corrective Action: Complete and sign employee reporting agreements per above and upload into SNACS.</p>
Site Name	Oakfield Elementary School	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	Flagged 12/20/2023 10:25 AM	<p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). At lunch, meal counts were not taken as the student received their reimbursable meal. 4K students were being entered into POS from a teacher order list before the students arrived in front of POS person with an unreimbursable meal. At breakfast, 4K students and special education students have meals taken to classroom from an order brought to cafeteria.</p> <p>Corrective Action: Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then submit 30 consecutive operating days of meal counts for both breakfast and lunch and corresponding edit check reports. The accurate counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</p>
Site Name	Oakfield Elementary School	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	322	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	Flagged 12/20/2023 10:27 AM	<p>Finding: The SFA did not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. The SFA is not completing monthly edit checks for each school prior to claim submission.</p> <p>Corrective Action: Upload monthly edit checks for lunch for September thru (insert month of onsite) into SNACS. Fiscal</p>

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		action will be calculated if meal counting and claiming errors are identified.
Site Name	Oakfield Elementary School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/03/2024 05:54 PM</p>	<p>Using the vegetables on the garden bar/salad bar to meet the weekly vegetable requirements is a wonderful way to expose children to additional fruits and vegetables. However, portion sizes of at least 1/8 cup each should be communicated to students with signage.</p> <p>Finding: The garden bar does not have specific signage indicating to students how much to take to meet the meal pattern to help make a reimbursable meal, because the 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 (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).</p> <p>Corrective Action: Submit a picture of completed signage on the garden bar.</p>
Site Name	Oakfield Elementary School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged 01/03/2024 05:56 PM</p>	<p>The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A “Domestic Commodity or Product” is an agricultural commodity or product that is produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands).</p> <p>The following information must be recorded on a Buy American Non-Compliant Product List:</p> <p>Date</p>

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	<p>Name of product</p> <p>Country of origin</p> <p>Reason</p> <p>Cost analysis</p> <p>Seasonality</p> <p>Availability</p> <p>Substitution</p> <p>Distribution</p> <p>Other</p> <p>A suggested Buy American - Non Compliant Product List template can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).</p> <p>Finding: Products are not being tracked - the country of origin, per the Buy American provision</p> <p>Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. If no country of origin is identified on the label, then the SFA must get documentation/ certification from the distributor or supplier. Send the PHN on the review a statement detailing how this will be addressed going forward, include the form that will be used.</p>
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Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
12/19/2023	3937	129	Administrative Review	ALL	FSD			
Comments								
						Created By	Created Date	
Household Notification of Benefit								
Households must be notified of an approved application in writing, email or verbally; however, written communication is encouraged. SFA is using letter printed from POS system. Does not contain full USDA NDS.								
12/19/2023 8:25:06 PM								
12/14/2023	3924	805	Administrative Review	ALL	FSD/Auth Rep			

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Comments							
					Created By	Created Date	
Special Dietary Needs							
U.S. Department of Agriculture (USDA) regulations 7 CFR Part 15b requires the school district will make reasonable modifications to accommodate students with disabilities including providing special dietary accommodations to students with a disability which restricts their diet.							
					12/14/2023 11:52:05 AM		
12/14/2023	3921	777	Administrative Review	ALL	FSD/Auth Rep		
Comments							
					Created By	Created Date	
Supply Chain Assistance (SCA) Funds							
SCA funds are to be exclusively used to purchase unprocessed or minimally processed domestic food products served in the National School Lunch (NSLP), School Breakfast (SBP), and Afterschool Snack (ASP) Programs. The USDA Allocation of Supply Chain Assistance Funds to Alleviate Supply Chain Disruptions in the School Meal Programs: Questions and Answers includes detailed information on allowable ways to utilize these funds. USDA's intent is that these funds will be used as quickly as practicable to alleviate supply chain challenges and price increases. Once the funds are deposited into the nonprofit school food service account (Fund 50), the SFA should implement a plan and timeline for spending the funds. SFAs may use SCA funds toward the payment of invoices associated with these agreements.							
It is incumbent on the SFA to ensure that such invoices, over the period in which the award is used, include charges for minimally processed domestic foods at least equal to the amount of SCA funds used to pay the invoices. SFAs will need to work with their FSMC/vendor/supplying SFA to ensure that appropriate expenditures are being made and documented for foods meeting the requirements as specified in the terms and conditions of the award. In practice, SFAs are not required to collect documentation from their FSMC/vendor/supplying SFA in advance of payment; however, there is an expectation that documentation will be available upon demand. Documentation should include invoices for minimally processed domestic foods purchased in support of the contract that are at least equal to SCA funds paid to the FSMC/vendor. In addition, SFAs retain the ability to purchase allowable food items outside of their food service management contract, as long as the contract permits such.							
DPI School Nutrition Team recommends SFAs start by looking at the cost of milk. Please consider the following:							
<ul style="list-style-type: none"> • If you contract with a FSMC/Vendor/another SFA and are charged a fixed per-meal price that includes milk, request the price per carton of milk. Apply this to the number of meals invoiced each month. This information may be provided through a communication such as a letter or email from your contractor. • Only milk served as part of a reimbursable meal under the NSLP, SBP, and ASP can be paid for using SCA funds. <ul style="list-style-type: none"> -Milk purchased for the Special Milk Program, Wisconsin School Day Milk Program, or any other program or nonprogram foods, may not be purchased/tracked using SCA funds. • Track monthly milk charges. The DPI SNT offers a Spreadsheet template. <ul style="list-style-type: none"> -Continue to add milk costs to the spreadsheet until your SFA has spent the full amount of SCA funds received. • Maintain this documentation for three years plus the current school year, as it may be reviewed as part of a future Administrative Review. • If milk alone is insufficient or you would like to include more items, we suggest looking at the cost of fruits and vegetables. • Documentation must be for invoices paid after the SCA funds are received. SCA funds cannot be spent before they are received. 							
					12/14/2023 11:38:10 AM		

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12/14/2023	3920	103	Administrative Review	ALL	FSD			
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Comments

	Created By	Created Date
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Carry Over

For up to 30 operating days into the new school year (or until a new eligibility determination is made, whichever comes first) an individual child's free or reduced price eligibility status from the previous year will continue within the same LEA. o When the carryover period ends, unless the household is notified that their children are directly certified or the household submits an application that is approved, the children's meals must be claimed at the paid rate. Though encouraged to do so, the LEA is not required to send a reminder or a notice of expired eligibility.

12/14/2023 11:11:12 AM