

Administrative Review Report

Cuba City School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/18/2019	04/22/2019
On-Site Review	05/07/2019	05/09/2019
Site Selection Worksheet	02/18/2019	04/15/2019
Entrance Conference	05/07/2019	05/08/2019
Exit Conference	05/09/2019	05/09/2019

Commendations:

The food service professionals at Cuba City Middle/High School are doing a fantastic job serving healthy, appealing meals to students. The serving line is bright and inviting, and staff have great rapport with students. The food service director keeps organized documentation and her attention to detail does not go unnoticed. Thanks for all you do to feed kids!

Kitchen and cafeteria are clean and comfortable – Thanks for providing a great meal environment for your students.

Kitchen staff clearly enjoys each other, has positive work habits, and shares laughter while working efficiently.

Administrative and business staff take the separation of non-profit food service account from other funds seriously. They have safeguards in place and respect the integrity of Fund 50

Kitchen offers 2 lunch entrée options which students order ahead for that day's service. This is a cost effective way to offer salads and sandwiches to those students who don't desire the main menu item. Kudos for increased choice + reduction in food waste = happy students.

Food storage is at correct temperature, clean and organized.

Students are polite and helpful.

Director treats everyone with kindness, compassion, and generosity.

The meal counting and claiming procedures are clear and correct.

Every application checked within our statistical sample was determined correctly.

The service line moves quickly, allows students to serve themselves, and functions well within a limited space with a lot of bodies.

Food safety is practiced daily, and taken seriously by kitchen staff.

Special Dietary needs of students are documented correctly. All food substitutions made outside of the meal pattern requirements are supported by a signed medical statement from a licensed medical professional. The kitchen staff offers substitutions with understanding and goodwill.

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Findings and Corrective Action:

Site Name	Cuba City School District
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	140
Corrective Action History	<p>Finding: The SFA did not update student eligibility changes to benefit issuance list after each direct certification run in a timely manner. In an effort to determine whether the household wanted to accept an increased benefit, the director was calling households and delaying the update up to 10 days until household gave a verbal yes.</p> <p>CA: Submit a statement outlining how the SFA will ensure that updates to the benefit issuance list are done in the required timeframe: within 3 days of DC for a benefit increase.</p>
Site Name	Cuba City School District
Form Name	Verification (207 - 215)
Question #	214
Corrective Action History	<p>Finding: The SFA did not provide ten calendar days notice to the household(s) when benefits are being reduced as a result of verification(7CFR 245.6a).</p> <p>CA: Submit a statement of understanding that ten calendar days must be provided to households prior to reducing benefits, as a result of verification. Review the Verification webcast on dpi.wi.gov/school-nutrition/training/webcasts.</p>
Site Name	Cuba City School District
Form Name	Verification (207 - 215)
Question #	215
Corrective Action History	<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>CA: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.</p>
Site Name	Cuba City Middle School
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	410
Corrective Action History	<p>Finding: During the week of review (April 8-12, 2019) there were weekly grain and meat/meat alternate (M/MA) shortages due to the daily offering of an Uncrustable, which credits as 1 ounce equivalent (oz eq) grain and 1 oz eq M/MA. Over the course of one week, this totals to 5 oz eq grain and 5 oz eq M/MA. The weekly lunch requirements for grades 6-8 are 8 oz eq grain and 9 oz eq M/MA (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf). See final report for more details.</p> <p>Fiscal action is required for any repeat weekly grain shortage violations from the previous Administrative Review. The following finding was documented from the School Year 2014-15 Administrative Review:</p> <ul style="list-style-type: none"> “Finding #2: A daily and weekly grain shortage was noted for students selecting the made-to-order salad. Students taking the salad need 2 oz eq of grains offered daily and a minimum of 10 oz eq throughout the week. Students taking the salad only receive 1.25 oz eq of grain daily.” <p>Therefore, fiscal action will be assessed for the weekly grain shortage. The Uncrustable meals will be reclaimed for the day of lowest participation during the</p>

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week of review. **Therefore, 3 meals will be reclaimed from April 10, 2019.**

Please note, repeat violations of a weekly grain or M/MA shortage during subsequent Administrative Reviews may result in fiscal action.

CA: Please submit a written statement explaining how the weekly grain and M/MA shortages will be corrected.

Technical Assistance Entries:

Smart Snacks - Beverages

If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie (=5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (<5 kcal/8 fluid oz; =10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable.

Smart Snacks - General

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Crediting Hashbrowns

Crediting Hashbrowns Per the Food Buying Guide (FBG), 2.25 oz by weight of hash brown potatoes credits as ¼ cup of starchy vegetable (https://foodbuyingguide.fns.usda.gov/). The hash browns served at lunch during the week of review are 2.54 oz for two pieces. This means that two hash browns credit as ¼ cup of vegetable. Keep this in mind when ensuring that students leave the line with a reimbursable meal.

Food service staff may conduct an [in-house yield study](#) to see if they can credit a food as more than what the FBG indicates (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy).

Verification

Q214:

Verification notices should include: A notice that documentation of income or receipt of assistance may be provided from any point in time between the month prior to application and the time the household is required to provide income documentation (USDA Eligibility Manual For School Meals, July 18, 2017). When documenting verification, complete the tracker and save a copy of all notifications/letters sent to households. Be sure to include the “we have checked” letter. File these records with the original application for 3 years plus the current SY.

Verification

Q207: In completing the FNS-742 note that any applications that were verified for cause outside of the required verification sample size as of November 15 must be recorded in VC-1. The results of the applications verified for cause must also be reported in section 5-8, but they should NOT be included in the number of applications selected for the verification sample reported in section 5-5.

Determining Applications

Q128: When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the Income Eligibility Guidelines one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually). (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>). For applications that have more than one frequency of payment indicated, each payment is

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converted to an annual amount, the annual amounts added together. That sum of their income is compared to the IEGs under the column indicating the annual frequency. Review the Income Conversions section of the Eligibility Manual (pg 61-62).

BI Updates

Q140: For an increase in benefits (for example a child who is moved from the reduced price to free category) the change is effective immediately and must be implemented no later than three operating days from the date DC indicated. The LEA must provide benefits promptly to ensure eligible children do not experience a break in meal access. The LEA may assume consent to receive free meal benefits from directly certified households if the household does not refuse benefits within a certain number of days, as determined by the LEA. As provided in 7 CFR 245.6(c)(6)(iii), if a household refuses free meal benefits, the LEA must discontinue providing free meal benefits as soon as possible. The LEA must document and maintain notification of the refusal. The documentation should correctly reflect the child's eligibility status, but should include a note that the family has elected to pay for meals.

Excess Cash Balance

Consider these additional ways to address the excess cash balance:

- Provide reduced eligible students with free meals. (See USDA Memo SP 17-2014)
- Provide universal free breakfast.
- Improve quality and variety of foods on menu.
- Offer more local products or start a Farm to School program or expand school gardens.
- Increase marketing of the school meal program to increase participation.
- Purchase additional or updated kitchen equipment if needed. (Section 210.04(a) of the regulations prohibits school food service revenues from being utilized to purchase land or buildings or to construct buildings.)
- Provide additional training to staff, which can include sending staff to conferences on school nutrition related topics.
- Considered applying for an exemption to raising paid meal prices, if required, according to the PLE Tool (cannot be used as a means to reduce excess cash balance, but may help prevent ECB in next SY).
- Carryover of the funds to be expended in the next school year or long range planning for the improvement of the school food service under a plan approved by SNT (Karrie).
- **Please note:** an annual report to DPI will be required as long as the excess fund balance exists

Non-Discrimination Statement

Q800: When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, "**This institution is an equal opportunity provider.**" Either of these statements must be in the same size font as the other text in the document.

Public Release

Q801: All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available. SFAs must annually distribute the Public Release to:

- Local news media
- Grassroots organizations (local organizations providing services to populations in need)
- Major employers contemplating or experiencing large layoffs
- Local Unemployment Office (as applicable)

SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

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Wellness Policy

Q1005: Cuba City School District's Wellness Policy indicates that the district will produce an annual progress report. Wisconsin Team Nutrition has created a tool for schools/districts to use as a method for evaluating their policy and communicating the results to the public. The *Local Wellness Policy Report Card Online Tool* allows schools/districts to enter policy-specific objectives and evaluate to what extent the objectives were achieved. Following completion of the tool, a report card is generated.

Professional Standards

Q1209: Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.). Log training minute for minute.
- SFAs 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. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- All part-time staff, including dishwashers, and non-nutrition program staff who work part-time administering the programs are required. Cuba City should include office staff who accept meal account monies and those who run POS systems at meal times.

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.