

# Administrative Review Report

Jefferson School District

**Review Schedule:**

<b>Schedule Type</b>	<b>Start Date</b>	<b>End Date</b>
Off-Site Review	03/15/2024	04/23/2024
On-Site Review	04/23/2024	04/24/2024
Site Selection Worksheet	03/15/2024	03/15/2024
Entrance Conference	03/15/2024	03/29/2024
Exit Conference	04/24/2024	05/08/2024

**Commendations:**

Thank you to the FSD and Administration at Jefferson School District for their professionalism and cooperation during the Administrative Review. Counting and claiming is accurate. Food safety is in action. Food service related policies are in place. Reporting and recordkeeping are in order. Thank you for serving healthy, nutritious meals to your students!

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## Findings and Corrective Action:

Site Name	
Form Name	Certification and Benefit Issuance (100 - 121)
Question #	108
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	CAP Submitted
Corrective Action History	<p><b>Finding:</b> The SFA's Hearing Official listed in the school nutrition program contract is no longer a part of the school district.</p> <p><b>Corrective Action :</b> Update the school nutrition program contract with the current, allowable program Hearing Official.</p>
Site Name	
Form Name	Certification and Benefit Issuance (100 - 121)
Question #	110
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding:</b> The SFA's direct certification notification letter does not include all required information including: explaining that the child is eligible for free benefits without further application ; free meal benefits extend to all school-aged children in the household except for in cases of a foster child; how to notify the SFA of any additional school-aged children in the household not listed on the notification and explain how the household can decline the benefit, the complete non-discrimination statement (7 CFR 245.6). Finding 2: The SFA's direct certification letter does not include information about how households that qualify can opt out of Summer EBT.</p> <p><b>Corrective Action 1:</b> Provide a statement that the <a href="#">SNT DC template letter</a> will be used, or upload a corrected letter template for direct certification notification to the household that will be used in future into SNACS.</p> <p><b>Corrective Action 2:</b> Provide the <a href="#">Summer EBT opt out</a> information to all households that qualified for free or reduced meals in SY 2023-2024. Upload copy of what was communicated to households in SNACS.</p>
Site Name	
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
Question #	777
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding:</b> The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed to receive the funds. The SFA is not aware of what the funds can be spent on and the funds are not being tracked separately.</p> <p><b>Corrective Action:</b> Review the <a href="#">SCA Q&amp;A</a> and the tracking template. Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for. Upload an example spreadsheet, workbook or document that will be used to track how the funds are spent.</p>

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Site Name	
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	709
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding:</b> SFA did not complete the DPI Nonprogram Foods Revenue Tool in SY 22/23 to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p><b>Corrective Action 1:</b> Complete the <a href="#">DPI Nonprogram Foods Revenue Tool</a> during SY23/24 and upload into SNACS using a 5 day reference period from the current school year.</p> <p><b>Corrective Action 2:</b> 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.</p>
Site Name	
Form Name	Indirect Costs (712)
Question #	712
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding:</b> Indirect costs are being charged to the nonprofit school food service account, which is unallowable in Wisconsin (6% of an IT salary cost). As discussed onsite the use of work tickets is not an acceptable form of documentation.</p> <p><b>Corrective Action:</b> All costs charged to the nonprofit school food service account must be made into direct costs. Use a two week <a href="#">time study</a> to determine the direct cost to Fund 50. Determine what the direct cost would be based on the salary or hourly wage x the # of hours or minutes per week. Upload the time study documentation into SNACS. If the indirect amount charged is greater than the direct cost calculated, the difference will need to be refunded to the nonprofit school food service account for SY 2022-23 through the Administrative Review. Any indirect costs that cannot be made into direct costs are unallowable and also need to be refunded.</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 Status	Flagged
Corrective Action History	<p><b>Finding:</b> The SFA did not adequately inform households about the national availability and location of free meals for students via the Summer Food Service Program (SFSP). this is a requirement of the NSLP and goes beyond letting households know you are serving meals during summer school at SDOJ.</p> <p><b>Corrective Action:</b> Provide a statement describing how households will be informed about the</p>

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	availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials. See the TA section of this report for more information.
Site Name	Jefferson Middle School
Form Name	Dietary Specification Assessment Tool (On Site Observation)
Question #	19
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Standardized recipes help school nutrition professionals create the meals the menu planner has planned, meet the daily crediting requirements, and meet the meal pattern. The food service director has created a grab-n-go recipe that serves one meal and lists the ingredients in a manner in which anyone could create this meal for students (great job!). Using historical data, it may be helpful to write the recipe to create as many grab-n-go meals as the school nutrition professionals may need on a given day.</p> <p><b>Finding:</b> Standardized recipes are required for all menu items made in-house with more than one ingredient. The Grab-n-Go lunches offered and served during the week of review, recipe titled PBJ, Cheese stick, is not credited correctly, and no procedures are listed. The fruit listed, Sunset Orchards Apple Slice, 2.0 oz wt bag does credit at ½ cup and a Ready-Set-Serve 1.6 oz wt bag of baby carrots also does not credit at ½ cup.</p> <p><b>Corrective Action:</b> Please update this recipe to include at least ½ cup of fruit and or vegetables. If students choosing this meal do not have access to additional fruit and vegetable options, please update the recipe to include at least ¾ cup of vegetables and ½ cup of fruit. If the line has been changed and these students will now have access to additional fruit and vegetable options, include a statement describing in detail how the line will be set up to accommodate this change</p>
Site Name	
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	126
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding 1:</b> The SFA did not process all household applications in compliance with 7 CFR 245.6(a). The household meal benefits were incorrectly determined. See the SFA-1 provided by the consultant for details. The Determining Official and assistant are untrained in determining applications and the regulations surrounding student eligibility determinations. Note that these errors are subject to Fiscal Action.</p> <p><b>Finding 2:</b> The SFA is unaware of how to accurately keep student benefit records within the SIS and POS software systems OR the systems are not capable of retaining important student eligibility information, or incompatible in sharing information. Eligibility dates were incorrect. Notes on extension of benefits were unavailable. Inactive students remain on the BI list. Student record reports do not produce a history of student eligibility and create incomplete individual student records.</p> <p><b>Corrective Action 1:</b> Notify the household of the correct meal benefit, per program requirements. Upload a copy of each Adverse Action letter or increase in Benefits letter sent</p>

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	<p>to each household. When all corrections have been made ensure the Benefit Issuance list student eligibilities and eligibility dates reflect the documentation. Upload the corrected BI list into SNACS.</p> <p><b>Corrective Action 2:</b> Both the Determining Official and Confirming Official (DO's assistant) will complete DPI's <a href="#">Free and Reduced Training</a> through our online learning library. Upload a Certificate of completion email for each person into SNACS. Plan to attend either the in-person DPI Free &amp; Reduced training offered in July at <a href="#">SNST</a>, or the virtual DPI Free &amp; Reduced training offered twice in August to advance your understanding of this critical NSLP performance standard.</p>
Site Name	
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	134
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding:</b> The SFA did not perform Direct Certification (DC) in the required timeframes. Full Enrollment DC runs must be performed at least 3 times each school year (7 CFR 245.6). Districts and private schools participating in the National School Lunch Program are required to run full enrollment student input files: 1st: beginning of the year (between July 1 - first day of school) 2nd: three months after first run (between October - December) 3rd: six months after first run (between January - March) 4th: between March 15 and April 1 (for CEP proxy report)</p> <p><b>Corrective Action:</b> Provide a statement of how and when the SFA will perform the full enrollment DC runs in the required time frames during the school year.</p>
Site Name	
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	138
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding:</b> The SFA did not effectively update student eligibility changes to benefit issuance list (BI) or the point of service (POS) for students who were new, transferred, or withdrawn. Inactive students were listed with current eligibilities. There is a lack of communication between the two SIS systems. the Determining Official is not directly notified when students become inactive, and so there is no clear indication in the POS system that a student is withdrawn.</p> <p><b>Corrective Action:</b> Provide a process that the SFA will use to ensure individual student meal eligibility will be updated accurately and timely to the BI list and the POS.</p>
Site Name	
Form Name	Verification (207 - 215)
Question #	207
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged

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Corrective Action History	<p><b>Finding:</b> SFA did not complete the verification process per 7 CFR 245.2.</p> <p><b>Corrective Action 1:</b> Have the Determining Official and Verifying Official complete DPI's <a href="#">verification webcast</a>. Upload a certificate of completion into SNACS.</p> <p><b>Corrective Action 2:</b> Submit a statement of understanding that verification must be completed annually by November 15. Please note that providing AR follow-up documentation of Verification to DPI in SY 24-25 will be required.</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><b>Finding:</b> The correct, current (2022 version) and complete non-discrimination statement is not included on all program materials, as required. This included all student eligibility notification letters, policies 8500, 8510, special dietary needs policy and meal charge policy.</p> <p><b>Corrective Action:</b> Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated. See: <a href="https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#nds">https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#nds</a></p>
Site Name	
Form Name	Professional Standards (1210 - 1219)
Question #	1217
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding:</b> Documentation of school food service staff training, including that of the the FSD, is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. Training should be food service related and job-specific.</p> <p><b>Corrective Action:</b> For each food service employee include all training hours completed this school year on the <a href="#">DPI professional standards training tracking tool</a>, or a similar form and upload each into SNACS.</p>
Site Name	Jefferson Middle School
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	431
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Be specific on production records about the identity, brand, portion size, and description of items served. Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Please refer to the Production Record Requirements for a list of all mandatory items that must be listed and filled in on production records (</p>

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<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf> ).

The menu planner has completed most of the planned portion size column well, however each day additional fruits and vegetables were added and portion sizes were not always clear. Providing room to write additions in each day could help with forecasting and consistency in serving sizes. During the week of review, fruit and vegetable substitutions were made. Have addition space to accommodate these changes and additions could make it clearer when the menu planner is forecasting future meals.

**Finding:** During the week of review (March 4-8, 2024) the breakfast production records were not consistently filled in daily, the Menu item (Juice and Fresh Fruit), Planned # of Servings, Total Planned Quantity (in purchase units), and Actual # of Servings Prepared/Available was missing. Each day the lunch production records had additional fruits and vegetables added with no clear serving size planned. Condiments are all listed with no planned serving size. Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements ( <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf> ).

**Corrective Action:** Submit one full week of completed production records for both breakfast and lunch. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
05/20/2024	5038		Administrative Review		FSD			

**Comments**

**Signage** must be posted and 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 (reference 7 CFR 210.10(a)(2)). 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 ½ cup fruit, vegetable, or a combination. Signage was available in the middle school cafeteria; however, it is recommended to reposition one set of signage to the hallway where students line up while waiting to enter the meal service area.

**Comments**

**Calendar of Program Requirements:** Keep this document at your fingertips, or print out the first 3 pages and put on the bulletin board to remind you when certain reporting is due. Note that further information and tools are on pages 4-15.

**Comments**

**On-site Monitoring:** Required to be completed by February 1<sup>st</sup> for NSLP and SBP programs each year. This is your own self-assessment of meal counting and claiming procedures and civil rights requirements.

**Comments**

**SCA Funds:** See the Q and A document: [SCA Funds In a Nutshell](#) and the [Expense Tracker](#) for strategies.

**Comments**

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**Summer Food Service program (SFSP):** All SFAs are required to inform households before the end of the school year of the availability and location of meals offered through the SFSP. Outreach for SFSP must be completed by all SFAs regardless of whether SFSP is offered by the SFA itself.

Acceptable outreach activities inform families about the availability and location of summer meals prior to the end of the school year. SFAs distribute information through means normally used to communicate with households of enrolled children. This may include newsletters, automatic calling and texting services, email, or mailings.

SFAs can inform families of summer meals by promoting the following:

- Access the [Summer Meals Site Finder](#) on the [Find a Summer Meals Site](#) webpage
- Call 211 to locate meals in the area
- Text "food" (in English or Spanish) to 304-304
- Visit the [Summer Food Service Program](#) webpage

Additional information can be found on the [Administrative Review](#) webpage and the [SFSP Outreach Materials](#) webpage. SFAs may also use ready-made promotional materials found within the [Summer Meals Outreach Toolkit](#) developed by No Kid Hungry.

## Comments

**Professional Standards/Development:** As part of the Healthy, Hunger-Free Kids Act (HHFKA), the USDA established minimum professional standards for school nutrition employees who manage and operate the National School Lunch Program (NSLP) and School Breakfast Program (SBP). The Professional Standards regulations in 7 CFR 210.30 establish **annual training requirements for all school nutrition program directors, managers and staff**. This required annual continuing education will vary based on each employee's role in the school nutrition program(s): <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf>

## Comments

**SBP Outreach:** SFAs must inform families of the availability of reimbursable breakfasts served under the [School Breakfast Program \(SBP\)](#) at the beginning and throughout the school year. The goal of providing school breakfast outreach is to increase participation in the SBP. Access the [School Nutrition Outreach Toolkit](#) through DPI Team Nutrition.