

Administrative Review Report

Bristol School District # 1

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/11/2024	05/08/2024
On-Site Review	05/07/2024	05/08/2024
Site Selection Worksheet	03/11/2024	03/12/2024
Entrance Conference	05/07/2024	05/07/2024
Exit Conference	05/08/2024	05/08/2024

Commendations from the PHN:

Thank you so much to all of the staff at Bristol Elementary School. From off site to the final exit conference, everyone was very helpful and accommodating. The food service director did a wonderful job providing all off site documentation in a timely and organized manner. The meal service on site for both breakfast and lunch was well executed by friendly staff and the meals looked very appealing. It was obvious that the staff at Bristol cares deeply for their students and does their very best to provide nutritious school meals to all.

From the Nutrition Program Consultant:

My sincere thanks to the staff at Bristol School District for your warm welcome. I appreciate the time and efforts spent preparing for and participating in the administrative review. I appreciate the food service director's knowledge and passion for feeding students healthy meals and exploring ideas to increase participation.

I was impressed with how well all staff work as a team and how well they interact with students. The kitchen was very clean and organized and the food was very appealing. They very obviously take a lot of pride in their work! I appreciate everyone's willingness to be receptive to feedback and technical assistance.

Awesome job and thank you for what you do for kids!

Recommendations:

- Registration for the DPI School Nutrition Summer Training is coming soon! Our Opening Ceremonies kick off this year's conference the afternoon of Monday, July 15, with classes running through Wednesday, July 17. Stay tuned for the conference schedule and registration, coming in early May. Get ready to champion excellence in school nutrition!
- If you can't attend our summer training in person, no problem! We will offer select courses virtually August 6th, 8th, 13th, and 15th, for added flexibility.
- See the [DPI School Nutrition Webpage](#) for up-to-date guidance, training opportunities, and information related to this report.

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Findings and Corrective Action:

Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	110	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	Flagged 05/07/2024 04:00 PM	<p>Finding: The SFA's application approval/denial letter and direct certification approval letter do not include all required information including information on how households that qualify can opt out of Summer EBT.</p> <p>Corrective Action 1: Upload to SNACS the corrected notification letter templates. CORRECTED ONSITE. NO FURTHER ACTION NECESSARY.</p>
	CAP Submitted 05/08/2024 09:55 AM	The eligibility letters have been revised and uploaded to SNACS
	CAP Accepted 05/08/2024 10:08 AM	CAP Accepted
Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/07/2024 04:16 PM	<p>Finding: The SFA does have an Unpaid Meal Charge Policy in place; however:</p> <ol style="list-style-type: none"> 1. The policy is not accurate as to when reimbursable meals or alternate meals will be provided. Furthermore, only reduced-price students are specifically indicated which could result in civil rights discrimination. <p>The policy refers to a "permissible negative balance amount" but then does not specify what the amount is nor what will happen if an account reaches this amount.</p> <ol style="list-style-type: none"> 2. The Unpaid Meal Charge Policy was not communicated and distributed to all households, annually (SP 46-2016).

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		<p>Corrective Action:</p> <ol style="list-style-type: none"> 1. Provide a timeline of when the Unpaid Meal Charges Policy will be updated to reflect specific and accurate information. 2. Provide an explanation of how the Unpaid Meal Charge Policy will be distributed to all households and staff, with tasks related to the policy, annually.
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 Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>05/07/2024 05:37 PM</p>	<p>Finding: On the Annual Financial Report (AFR), revenues and expenditures must match the WiSFiP auditor's report to ensure that all food service revenues and expenditures are accurately reported. If they do not match, the AFR must be corrected and resubmitted prior to December 31.</p> <p>The Expenditures on the AFR are \$5652.88 less than the WiSFiP auditor's report. The Revenues on the AFR are \$10,492.45 more than the WiSFiP auditor's report.</p> <p>Corrective Action: Determine the reason for the discrepancy and complete an AFR correction template which will be provided by the NPC reviewer. Upload AFR correction template into SNACS. Since it is past the December 31 deadline, the NPC will forward this to the DPI accountant to make the adjustments in the system.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	<p>Flagged</p> <p>05/07/2024 04:30 PM</p>	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>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. CORRECTED ONSITE. NO FURTHER ACTION NEEDED.</p>

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	CAP Submitted 05/08/2024 09:54 AM	The DPI template for handling USDA program complaints of discrimination is posted on the school nutrition page of the district website.
	CAP Accepted 05/08/2024 10:08 AM	CAP Accepted
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	805	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/07/2024 04:29 PM	<p>Finding: Two areas of the Dietary Modifications Policy (school board policy 8500) need to be changed:</p> <ol style="list-style-type: none"> 1. In situations where a medical statement or IEP is not immediately available, is incomplete, or requires additional clarification, USDA regulations require that the meal modification still be made if there is enough information to provide a safe meal. The USDA does not specify how long to wait or how many attempts are needed to receive documentation before discontinuing a meal modification. However, reasonable attempts should be made to get the correct documentation. 2. The SFA should not ask for a student's medical condition, but only how the condition or symptom affects the student's diet. <p>Corrective Action:</p> <ol style="list-style-type: none"> 1. Remove the language from the Dietary Modifications policy that indicates documentation must be submitted "within five (5) school days...or the dietary modification may be discontinued until such a statement is received". 2. Change the items the certification must identify to: <ol style="list-style-type: none"> A. an explanation of how the child's physical or mental impairment restricts the child's diet. B. the food(s) to be avoided C. the food(s) to be substituted <p>Provide a timeline for when the Dietary Modifications policy will be changed and the name of the person responsible for ensuring the update is made.</p>

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Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/07/2024 04:40 PM	<p>Finding:</p> <ol style="list-style-type: none"> 1. Current Local Wellness Policy (LWP) is missing 9 of 13 required content areas and appears to have not been updated since it's creation in 2011 (7 CFR 210.31). 2. A triennial assessment of the LWP was not completed. <p>Corrective Action:</p> <ol style="list-style-type: none"> 1. Create a wellness committee with a diverse group of stakeholders and work with Neola to create a new LWP. Provide a timeline for when the new LWP will be completed and shared with the public. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. 2. Provide a statement that a triennial assessment of the new policy will be completed in fall of 2027 and every three years moving forward.
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	CAP Accepted	
Corrective Action History	Flagged 05/07/2024 04:31 PM	<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. CORRECTED ONSITE. NO FURTHER ACTION NEEDED.</p>
	CAP Submitted 05/08/2024 09:52 AM	The information to find free meals in the summer is posted on the school nutrition page of the district website
	CAP Accepted 05/08/2024 10:08 AM	CAP Accepted

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Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #		
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	Flagged 05/07/2024 03:53 PM	<p>Finding: The free and reduced-price application must be shared with the instructions and the frequently asked questions. However, the frequently asked questions document is not posted on the district webpage.</p> <p>Corrective Action: Please post the frequently asked questions to the webpage along with the meal application and instructions. CORRECTED ONSITE, NO FURTHER ACTION NEEDED</p>
	CAP Submitted 05/08/2024 09:55 AM	The FAQs have been posted to the school nutrition page of the district website
	CAP Accepted 05/08/2024 10:09 AM	CAP Accepted
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	136	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/07/2024 03:46 PM	<p>Finding:</p> <ol style="list-style-type: none"> 1. The SFA is providing fee waivers for all students who qualify for free or reduced-price meals. However, families must be able to choose which, if any, fees they would like waived. 2. A non-disclosure agreement must be signed by any staff associated with waiving fees (who is not an eligibility official). <p>Corrective Action:</p> <ol style="list-style-type: none"> 1. Upload to SNACS a copy of the Sharing of Information form that will be used for the 24-25 SY and beyond or provide a statement that the practice of automatically waiving fees for students receiving benefits, will be discontinued.

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		2. Provide a statement that any staff associated with waiving fees (who is not an eligibility official), for students receiving benefits, will be completed and kept on file.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	Flagged 05/07/2024 04:23 PM	<p>Finding: Incorrect non-discrimination statements were posted on the school nutrition webpage, in both English and Spanish.</p> <p>Corrective Action: Update the school nutrition webpage with the correct non-discrimination statements in both English and Spanish. Upload into SNACS a screenshot of materials updated. CORRECTED ONSITE. NO FURTHER ACTION NEEDED.</p>
	CAP Submitted 05/08/2024 09:57 AM	The Spanish and English NDS have been updated on the school nutrition page of the district website.
	CAP Accepted 05/08/2024 10:09 AM	CAP Accepted
Site Name	Bristol Elementary	
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	Flagged 05/07/2024 09:42 AM	<p>Finding: Salad Bar production record did not include all grains that are available to students who chose to take the second entrée salad.</p> <p>Corrective Action: Please provide a salad bar production record from after the administrative review occurred that has all grain options available to students filled out.</p>
Site Name	Bristol Elementary	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 05/07/2024 04:46 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 was missing the Time as a Public Health SOP, as it was observed that snack milk is picked up prior to service, and a Field Trip SOP. These SOPs are found on the Food Safety section of the DPI school nutrition website.</p> <p>Corrective Action: Upload to SNACS a copy of the two new SOPs indicated above.</p>
Site Name	Bristol Elementary	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/07/2024 08:58 AM	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Cherry Tomatoes, Cucumbers (Mexico) Bananas(Guatemala) Olive Oil (Italy)</p> <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products listed above. Noncompliant Product List templates can be found on the Buy American webpage.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
05/08/2024	4967		Administrative Review		Persons responsible for Local Wellness Policy			
Comments						Created By		Created Date
The SFA is in the process of developing a new local wellness policy (LWP). When the policy is finished, the DPI school nutrition team is happy to review it before it goes to the school board for approval. Please note: 1. It is required for a diverse group of stakeholders to develop or review the LWP, and the public must be invited. 2. The current non-discrimination statement must be included. 3. Review the DPI LWP checklist to ensure all required areas are included in the policy.								5/8/2024 10:17:25 AM

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05/08/2024	4960		Administrative Review		FSD				
Comments									
					Created By	Created Date			
<p>An entrée the day of and the day after it is served as part of a reimbursable meal is allowed to be sold to students a la carte and is then exempt from Smart Snacks requirements. An entrée is defined as the main course of a meal that meets one of the following definitions:</p> <ul style="list-style-type: none"> • A combination food of meat/meat alternate and whole grain-rich grain • A combination food of meat/meat alternate and vegetable or fruit • A meat/meat alternate alone (excludes yogurt, cheese, nuts, seeds, nut/seed butters, and meat snacks [e.g., beef jerky]) • A breakfast entrée defined by the menu planner and served as part of the School Breakfast Program 						5/8/2024 8:07:50 AM			
05/08/2024	4959		Administrative Review		FSD				
Comments									
					Created By	Created Date			
<p>Schools may allow greater amounts than the required minimums by offering self-service or second servings of fruits and vegetables. Additional offerings count towards the weekly calorie limits, but fruits and vegetables are generally lower in calories.</p>						5/8/2024 8:01:02 AM			
05/08/2024	4958		Administrative Review		FSD				
Comments									
					Created By	Created Date			
<p>Improve the quality of school meals and support your local community by incorporating Farm to School (F2S) activities in school meal programs. F2S activities can include the use and promotion of locally grown foods, taste testing, agriculture and nutrition education, and hands-on learning opportunities in a school garden. Schools can participate in their own capacity and there are no requirements for involvement. The goal of F2S is to meet the needs of your community. Visit the DPI F2S webpage: https://dpi.wi.gov/school-nutrition/farm-to-school for more information.</p>						5/8/2024 7:58:16 AM			
05/08/2024	4957		Administrative Review		FSD				
Comments									
					Created By	Created Date			
<p>Around the World in 80 Trays Help the SNT reach our goal of 80 SFAs participating in Around the World in 80 Trays next school year. Take the pledge and use the week of January 13-17, 2025, to introduce new flavors, create culturally inspired dishes, explore the tantalizing world of herbs and spices and connect with students.</p>						5/8/2024 7:57:36 AM			

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Visit the Around the World in 80 Trays webpage (https://dpi.wi.gov/school-nutrition/programs/national-school-lunch/around-the-world-in-80-trays) for event information. Document the event (pictures, video, sound clips, etc) and send it to DPIFNS@dpi.wi.gov so we can share your success!								
05/07/2024	4956		Administrative Review		FSD and Business Services			
Comments					Created By	Created Date		
SFAs are required to ensure that all revenue from the sale of non-program foods accrues to the non-profit school food service account (7 CFR 210.14(f)). Non-program foods include any food sold that is not part of a reimbursable meal. If the SFA would like to give students an opportunity to purchase an extra entrée or other a la carte foods, all costs must be covered by revenues received from the sale of those foods including food, labor, equipment, purchased services, and other expenses. In addition, SFAs should price extra entrees in a way that supports reimbursable meals. An extra entrée and milk should not be a better deal than a reimbursable meal.						5/7/2024 5:12:05 PM		
05/07/2024	4955		Administrative Review		Persons responsible for policies and school meals			
Comments					Created By	Created Date		
SFAs operating the school meals programs are required to have a written and clearly communicated policy to address unpaid meal charges per USDA memo SP 46-2016. USDA and the SNT have developed resources to assist SFAs in meeting this requirement and in their efforts to manage the challenge of unpaid meal charges. These resources are found on the Unpaid Meal Charges Policy section of the SNT website (https://dpi.wi.gov/school-nutrition/program-requirements/financial-management).						5/7/2024 4:58:43 PM		
05/07/2024	4954		Administrative Review		Person responsible for the food service account			
Comments					Created By	Created Date		
Indirect costs not allowable in Wisconsin; therefore, must be made into direct costs. Continue to keep documentation which shows shared salaries charged to food service are supported by a time study, which is completed at least once per year.						5/7/2024 4:53:22 PM		
05/07/2024	4953	305	Administrative Review	ALL	FSD			

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Comments		
	Created By	Created Date
Field trip meals must be counted at the point when the student receives the meal, and this meal count is then entered into the point of service system. Meal counts taken before the field trip, should not be entered into the point of service system.		5/7/2024 4:04:43 PM