Cameron School District

Team Composition:

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/08/2023	01/16/2024
On-Site Review	01/16/2024	01/17/2024
Site Selection Worksheet	12/08/2023	12/08/2023
Entrance Conference	12/14/2023	12/14/2023
Exit Conference	01/17/2024	01/31/2024

Commendations:

Thank you also to the food service director for being available for discussion all day during the on-site visit. It is clear that the director cares deeply for the students and puts in great effort to ensure they receive the meal benefits they qualify for and nutritious meals. The director has many responsibilities and does a great job overall managing the school meals programs. Two hundred and ninety-two free and reduced meal application determinations were reviewed, and only one error was identified. Verification was completed on time and accurately.

While onsite we observed the elementary school kitchen has impressively clean walk-in coolers and freezers good work keeping storage facilities clean! Nutrition staff was efficient and worked well together. Financial management of program funds is careful and consistent. This SFA does a good job tracking the professional development of all school nutrition staff. Thank you for being receptive to suggestions and having a desire to keep learning and improving the programs.

Cameron School District

#### 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 Status	Flagged
Corrective Action History	<ul> <li>Finding: Fund 50 is billing the afterschool program operators for the cost of foods served in ASP, retaining leftover foods, and then claiming those snacks for reimbursement. This is an unallowable practice within the NSLP. Because the SFA is offering snacks free to all students, the SFA could invoice the afterschool program operator for the difference in reimbursement for paid and reduced eligible snacks as tracked it by the POS but it cannot bill the operator "at cost" and it cannot bill for any portion of snack served to a free student. This would be a similar scenario to Fund 10 paying for the difference of offering all snacks free to non-area eligible ASP.</li> <li>If the SFA intends to continue in ASP (claiming snacks for reimbursement) note that subsidizing reduced price and paid snacks is an allowable cost to the nonprofit school food service account. This is because PLE statutory and regulatory requirements only apply to prices for paid lunches and do not apply to the NSLP Afterschool Snack Program.</li> <li>If the SFA discontinues ASP, the snacks would need to be sold to the afterschool program operator at nonprogram food prices. The SFA would enter these snack items into the nonprogram food revenue tool to calculate the price.</li> <li>Corrective Action: Submit a statement as to how the ASP program will move forward financially and ensure that all expenses and revenues in ASP are reported within that program.</li> </ul>
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	<ul><li>Finding: The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed to receive the funds. The funds are not being tracked separately.</li><li>Corrective Action: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for. Upload a sample of the way you are or will begin tracking how these funds are spent down to \$0. See the TA section of this report for a tracking tool you may choose to use.</li></ul>
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 HistoryFinding: SFA did not complete the DPI Nonprogram Foods Revenue Tool to determine compliance with nonprogram foods pricing and ratio requirements 7 CFR 210.14. Each year in which the SFA sells any nonprogram foods other than Adult meals and single milks the DPI Nonprogram Foods Revenue Tool must be completed.Corrective Action HistoryCorrective Action 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year 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 #	803			
TA Log #	No TA Log# found			
Due Date				
Corrective Action Status	Flagged			
Corrective Action History	Findings: The SFA does not have internal procedures for handling discrimination complaints specific to 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, share with staff, and upload into SNACS.			
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	Finding: The SFA did not adequately inform households about the nation-wide availability and location of free meals for students via the Summer Food Service Program (SFSP). Corrective Action: Provide a statement describing how households will be informed about the availability of SFSP nation-wide, as well as at Cameron School District, for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.			
Site Name				
	Certification and Benefit Issuance (124 - 142)			

Question #	126			
TA Log #	No TA Log# found			
Due Date				
Corrective Action Status	Flagged			
Finding: Two hundred and ninety-two free and reduced meal application determinations were reviewed, one error was identified. The SFA did not pro- all household applications in compliance with 7 CFR 245.6(a). The household meal benefits were incorrectly calculated. See the SFA-1 uploaded by the consultant for details.Corrective Action HistoryCorrective Action: Using the Adverse Action template letter, notify the household of the correct meal benefit, per program requirements, ensuring household has 10 days notice before the reduction in benefits is made. Uplo copy of the letter to the household and documentation that the benefit issue list has been updated into SNACS.				
Site Name				
Form Name	Professional Standards (1210 - 1219)			
Question #	1219			
TA Log #	No TA Log# found			
Due Date				
Corrective Action Status	Flagged			
Corrective Action History	<ul> <li>Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) at the POS have not received sufficient training (7 CFR 210.30).</li> <li>Corrective Action: Ensure that any non-food service staff who work at the POS for NSLP, SBP or ASP, receive DPI's Civil Rights training, DPI's Point of Service training, and either Offer vs. Serve training or Meal Pattern training annually. Report the name and position of any non-food service staff. Upload certificates of completion for these 3 trainings for each of these POS persons into SNACS. See the TA section of this report for links to these specific trainings.</li> </ul>			
Site Name	Cameron El			
Form Name	Meal Counting and Claiming - Day of Review (317-321)			
Question #	318			
TA Log #	No TA Log# found			
Due Date				
Corrective Action Status	Flagged			
Corrective Action History	Finding: The meal counting and claiming system at the Elementary School does not result in accurate meal counts by eligibility (7 CFR 210.7). NSLP and SBP meal counts were not taken as the student received their reimbursable meal. Corrective Action 1: Correct the meal counting process to ensure meals are tracked as the student receives their meal. Submit a statement describing the corrected POS process. Include 1) how classrooms will report preorders to the kitchen for meal preparation purposes, 2) which staff person(s) will attend the POS, 3) where the POS is located in relation to the service line (before or after) 4) which staff person will be ensuring that a student has			

	<ul> <li>received a reimbursable meal and 4) how each student will interact at the POS (for example, giving a number or a card, entering their own PIN, being checked off on a class roster by the POS staff person).</li> <li>Corrective Action 2: Ensure that all students of all ages have the ability to select their own meal in the meal service line and attend the POS. Submit a statement as to which person/staff position will ensure that the corrected pattern of meal service will be maintained throughout each school year.</li> <li>Corrective Action 2: Submit one month of consecutive operating days of meal counts for NSLP and SBP at the Elementary School and corresponding edit check reports. Clean counts will be used to recalculate adjustments required to monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</li> </ul>
Site Name	Cameron El
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	406
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	Preschool students are allowed to be served the K-5 lunch and breakfast meal patterns when they are served at the same time, in the same way, and in the same place as the other grade groups, under the co-mingling flexibility. This flexibility may be used in situations in which it would be a challenge for staff to determine, during meal service if a child is in preschool or older. It may also be used when it would be difficult to provide each age group the proper foods and portion sizes according to the grade-appropriate meal patterns. Finding: The preschool students were served the K -5 breakfast and lunch meal pattern but were not served at the same time and in the same way as the older students. Children who are not yet in kindergarten must be served the preschool meal pattern if not co-mingled with other grade groups at meals. Corrective Action: The SFA has the choice to either use the co-mingling flexibility or to serve the preschool students separately . Submit a detailed statement of the choice that the SFA makes and either how the Cameron Elementary School will co-mingle all students, submit one week of completed preschool students are served the preschool meal pattern. Also, all school nutrition professionals and all preschool teachers and staff must watch the Preschool Meal Pattern webcast. (http://media.dpi.wi.gov/school-nutrition/preschool-meal-pattern/story.html)
Site Name	Cameron El
Form Name	Offer vs Serve (500-502)
Question #	500
TA Log #	No TA Log# found

Corrective Action Status	Flagged				
Corrective Action History	Finding : Although no non-reimbursable meals were observed during the days of onsite review, many students were made to take more than what they needed at both breakfast and lunch. The breakfast and lunch Offer versus Serve (OVS) requirements are not fully understood by all staff at the point of service. OVS resources on WI DPI's Menu Planning webpage may be used as training resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu- planning). The Meal Pattern e-learning resources may also be helpful. Corrective Action: Have staff responsible for determining reimbursable meals attend a training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.				
Site Name	Cameron El				
Form Name	Civil Rights (811-812)				
Question #	811				
TA Log #	No TA Log# found				
Due Date					
Corrective Action Status	Flagged				
Corrective Action History	Finding: The nondiscrimination "And Justice for All" poster is located in the meal service area and is visible to students however it is not the current allowable 2022 AJFA poster which shows the Justice building. (FNS Instruction 113). Corrective Action: Replace the AJFA posters at the Elementary School with the 2022 version of the poster which feature the Justice building in green rather than Lady Liberty. Hang the USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area for program participants. Upload a photo of the newer/currently allowed posters in place. See the TA section of this report for links to the current allowable posters.				
Site Name	Cameron El				
Form Name	Wisconsin School Day Milk Program				
Question #	10				
TA Log #	No TA Log# found				
Due Date					
Corrective Action Status	Flagged				
Corrective Action History	<ul> <li>Finding: Documentation was not available to determine if the milk served as part of the Wisconsin School Day Milk Program (WSDMP) meets the criteria for "Wisconsin produced milk". Wisconsin produced milk means that all or part of the raw milk used by the milk processor was produced in Wisconsin. Per the Agreement for the WSDMP the SFA agrees to serve Wisconsin produced milk.</li> <li>Corrective Action 1: Submit documentation showing the milk used in the WSDMP is produced or partially produced in Wisconsin. Documentation may include a statement from the distributor, milk invoices showing where the milk is produced or any other documentation showing the milk used in the WSDMP is a Wisconsin agricultural product.</li> <li>Corrective Action 2: Provide a statement of understanding that procurement documents for milk must include language that WI produced milk be provided for this program.</li> </ul>				

Cameron School District

Site Name		Carrow							
Site Name			Cameron El						
orm Name		Afters	Afterschool Snack Program						
uestion #		4							
A Log #		No TA	Log# found						
ue Date									
orrective Act	ion Status	Flagge	ed						
Due Date           Corrective Action Status         Flagged           Finding 1: Afterschool Snack counts were incorrectly counted (7 CFR 210.10 The point of service(POS) is inconsistent; not all students are counted as th receive a snack. The snack counts claimed for reimbursement cannot be validated. Production records provided indicate discrepancies with meal cou in the total number of snacks served each day. During one week of the revi month snack counts totaled 147 while production records indicated only 10 complete snacks could have been served.           Corrective Action 1: Submit one month of consecutive operating days of po service snack counts at the Elementary School, the month of snack menu, i production records. Prepare an excel line of claim (see CA 2) using these co and upload into SNACS. Do not submit the claim. These clean counts will be used to recalculate adjustment required to monthly claims back to the beginning of the school year and ma result in a fiscal reclaim.           Finding 2: Afterschool Snack counts were incorrectly claimed (7 CFR 210.10 SFA listing the NSLP ADA as the Afterschool snack ADA. Also, Middle Schoo students are being claimed at the Elementary school where snack is served not at their enrolled school.           Corrective Action 2: Take daily attendance at each and all afterschool enrichment and educational programs offering ASP, separating Elementary School attendance and Middle School attendance. Upload these attendance counts byschoolinto SNACS. Use this actual attendance count to calculate the ADA for the Afterschool snack claim you prepare each month moving forward.					as they e l counts e review y 101 of point of enu, and se counts ments d may 10.10) by chool erved and ting hese daily int to				
Fechnical As	sistance En	itries:							
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name	
01/31/2024	4197		Administrative Review		FSD				
				Comments					

file a complaint and the complaint procedures. To meet this requirement, the <u>USDA And Justice for All poster</u> must be placed in a prominent, visible location wherever meals or snacks are served. This location may include a cafeteria, food service area, or classroom. If additional posters are needed, make sure to print in color in the required 11"x17" size and 14-point. We have received clarification from USDA that SFAs are in compliance if either the 2019 or 2022 version of the poster is displayed.

01/23/2024 4105 Administrative Review	All program staff and district administration
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Cameron School District

Comments

Summer Food Service Program (SFSP) Outreach • A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. • The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months. • SFAs are required to inform families where to find free summer meals. 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 <u>Summer Meals Site Finder</u> on the <u>Find a Summer Meals Site</u> webpage
- Call 211 to locate meals in the area
- Text "food" (in English or Spanish) to 304-304
- Visit the <u>Summer Food Service Program</u> webpage

01/23/2024	4104	Administrative Review	All School Staff and Superintendent				
Comments							

Point of Service (POS) Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record, and claim the number of meals actually served to students by category, i.e., paid, reduced-price, and free at the point, place, and time of service. Additionally, the number of meals served free and reduced-price and claimed for reimbursement must have adequate documentation on file to support the claim.

To do this, any school food service meal counting and claiming system must contain ALL of the basic elements listed below:

- Eligibility documentation
- Collection procedures
- Point of service meal counts
- Reports Claim for reimbursement
- Internal controls.

Collection procedures refer to all the steps within the meal count system involved in paying for meals and issuing and collecting the medium of exchange. A medium of exchange is defined as cash or any type of ticket, token, ID, name, or number which eligible students exchange to obtain a meal.

All meals served in the National school Lunch and School Breakfast Program and counted for reimbursement must meet the meal pattern requirements as specified in the program regulations and be served to eligible students.

Meals must be counted at the point of service (POS) where it can be accurately determined that a reimbursable meal has been served to a specific student. Only one meal per student per meal service may be claimed for reimbursement.

Some meal count systems that are not acceptable include:

• Attendance/classroom meal counts - meal counts prior to meal service are important for production purposes but **do not** provide an accurate count of meals served.

• Tray or entrée counts - tray or entrée counts do not ensure all required components were on the tray, trays were not stuck together, or that each entrée was part of a reimbursable meal.

• Backout counts –Counting the number of leftover meals from the starting meal count do not account for dropped trays, or that each entrée was part of a reimbursable meal.

01/23/2024	4098	Administrative Review	FSD, authorized	
			Rep, and all	
			program staff	

Comments								
The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs and for staff working in all positions within the programs. It is highly recommended that the food service director and food service staff attend DPI program specific trainings to learn the most up-to-date program requirements, policy changes and best practices. SNT will offer <u>School Nutrition</u> <u>Summer Training</u> online and in person during summer 2024. Find more information on these training opportunities on the <u>DPI School Nutrition Training Webpage</u> .								
01/23/2024	4096		Administrative Review		FSD, and all program staff			
				Comments				
Calendar of Requirements - • It is highly recommended that the authorized representative and food service director use the <u>Calendar of Program Requirements</u> to help keep track of tasks and due dates. The digital version of the calendar has links included, though it could also be printed and written on as tasks are completed. The calendar is designed to be fairly comprehensive and is generally organized in the order that things must be completed each year.								