

# Administrative Review Report

Kiel Area School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/09/2023	05/08/2023
On-Site Review	05/09/2023	05/10/2023
Site Selection Worksheet	03/09/2023	03/31/2023
Entrance Conference	05/09/2023	05/09/2023
Exit Conference	05/10/2023	05/10/2023

## Commendations:

Thank you to all staff at Kiel Area School District for the cooperation during this Administrative Review (AR). A big thank you to the Food Service Director for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. We would like to extend a heart-felt thank you to the staff at Zielanis Elementary all were friendly, and helpful during our visit and willing to work to create an excellent program for the students. The FSD is running a wonderful meal program that is colorful, healthy, with a variety of choices for students every day. The students enjoy the daily meals you are providing! Keep up the great work you are doing! Great job!

## Recommendations:

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 will offer School Nutrition Summer Training online and in person in 2023. Find more information on these training opportunities on the [DPI School Nutrition Training Webpage](#).

SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin [DPI School Nutrition GOALS Training Webpage](#).

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Findings and Corrective Action:

<b>Form Name</b>	Meal Counting and Claiming (300 - 311)
<b>Question #</b>	305
<b>Corrective Action History</b>	<p><u>Finding:</u> The SFA has an Unpaid Meal Charge Policy in place, however, is not following the policy. This policy also does not communicate to households what will happen after the student reaches the maximum allowable negative balance.</p> <p>For a snapshot of what the policy should include, see the <a href="#">Unpaid Meal Charges In a "Nutshell"</a>. For a comprehensive overview including best practices and helpful materials, see the Unpaid Meal Charges section of the <a href="#">Financial Management Webpage</a> or the <a href="#">USDA Unpaid Meal Charges Webpage</a>.</p> <p><u>Corrective Action:</u> Provide a timeline of when the policy will be updated and a statement of understanding that the SFA must adhere to this policy.</p>
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)
<b>Question #</b>	700
<b>Corrective Action History</b>	<p><u>Finding:</u> On the Annual Financial Report, all of the revenues and expenses were not correctly broken out by program and expense category (7 CFR 210.19).</p> <p>The categories of the AFR that should be addressed when tracking expenditures can be found here: <a href="#">Expenditure Categories for Food Service AFR</a></p> <p><u>Corrective Action:</u> Send the corrected report to the NPC. Once approved, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.</p>
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	807
<b>Corrective Action History</b>	<p><u>Finding:</u> The <a href="#">Civil Rights Self-Evaluation Compliance</a> Form (PI-1441) was not completed by October 31, 2022, was completed on Feb 6, 2023.</p> <p><u>Corrective Action:</u> Submit a statement of understanding that this form must be completed by October 31st every school year.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1000
<b>Corrective Action History</b>	<p><u>Finding:</u> Current Local Wellness Policy (LWP) does not include all of the required content and is missing Public Involvement, School Meals, Foods Sold Outside of the School Meal Programs, Food Provided but Not Sold, Food and Beverage Marketing, Nutrition Promotion, Triennial Assessment and the full USDA Non-discrimination Statement. (7 CFR 210.31).</p> <p>SFAs are required to have language in their LWP that relates to all the content areas listed in the <a href="#">LWP Checklist</a> found on the <a href="#">Local Wellness Policy section</a> of the DPI SNT website.</p> <p><u>Corrective Action:</u> Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
<b>Question #</b>	1601
<b>Corrective Action History</b>	<p><u>Finding:</u> 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>SFAs can inform families of summer meals by promoting the following methods:</p>

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		<ul style="list-style-type: none"> <li>• Promotion of the Summer Meals Locator on the DPI Summer Meals webpage</li> <li>• Promotion of calling 211 to locate meals in the area.</li> <li>• Promotion of the ability to text 'food' (in English or Spanish) to 304-304</li> <li>• Promotion of visiting the Summer Food Service Program webpage</li> </ul> <p><u>Corrective Action:</u> 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>
<b>Form Name</b>	Meal Counting and Claiming (314 - 316)	
<b>Question #</b>	314	
<b>Corrective Action History</b>		<p><u>Finding:</u> It was observed that the 4K lunch in the classroom was being counted before the students took the meal. Meals must be counted at the point of service (POS) where it can be accurately determined that a reimbursable meal has been served.</p> <p>Some meal count systems that are not acceptable include:</p> <ul style="list-style-type: none"> <li>• Attendance/classroom meal counts - meal counts prior to meal service are important for production purpose but do not provide an accurate count of meals served.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p><u>Corrective Action:</u> Provide a statement of how this point of service will be corrected so that it accurately counts the meal as the meal is being served to the student.</p>
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>Corrective Action History</b>		<p><u>Finding:</u> The correct <a href="#">USDA Non-discrimination Statement</a> was not on all program materials including 8500 Food Service Policy, 8510 Wellness, and the Sharing/Disclosure agreement.</p> <p><u>Corrective Action:</u> Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1216	
<b>Corrective Action History</b>		<p><u>Finding:</u> 2 school nutrition program staff did not have completed training trackers available to review to show that they have completed the required training hours for the current school year (7 CFR 210.30).</p> <p><u>Corrective Action:</u> Provide a training plan for how each staff member that is not in compliance will meet the required training hours for the current school year.</p>
<b>Site Name</b>	Zielanis EI	
<b>Form Name</b>	Meal Counting and Claiming - Review Period (322-325)	
<b>Question #</b>	325	
<b>Corrective Action History</b>		<p><u>Finding:</u> SFA does has internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8, however, was not using the correct report before entering claims. Meal counts by eligibility category were not correctly reported on the monthly claim.</p> <p>For the Skyward system Accuclaim/edit checks must be used. Transaction or daily summary reports cannot be used for claim submission.</p>

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		<u>Corrective Action:</u> (Systemic)- Upload monthly edit checks (Accuclaim) for breakfast and lunch for September thru May into SNACS or to Nutrition Program Consultant.
<b>Site Name</b>	Zielanis EI	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	406	
<b>Corrective Action History</b>		<p><u>Finding:</u> The preschool students were served the K-5 meal pattern but were not served at the same time and in the same place 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.</p> <p><u>Corrective Action:</u> Submit a statement describing the specific changes made to meal service in order to serve the preschool students the age-appropriate meal pattern. If using a new production record, please upload into SNACS.</p>
<b>Site Name</b>	Zielanis EI	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	435	
<b>Corrective Action History</b>		<p><u>Finding:</u> Preschool students only eat 1/2 of the sub sandwiches which would only provide 1 oz. eq. M/MA but the daily minimum requirement at lunch is 1.5 oz. eq. M/MA for preschoolers.</p> <p><u>Corrective Action:</u> Please provide updated recipes for both sub sandwiches recipes that will reflect the process for providing 1.5 oz. eq. M/MA on half of a sub like we did on site on the day of review.</p>
<b>Site Name</b>	Zielanis EI	
<b>Form Name</b>	SFA On-Site Monitoring (901 - 904)	
<b>Question #</b>	901	
<b>Corrective Action History</b>		<p><u>Finding:</u> SFA did not meet on-site monitoring requirements for SBP per 7 CFR 210.8 prior to February 1, was completed on April 28.</p> <p>Every school year, SFAs with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP. The <a href="#">NSLP On-Site Monitoring Form</a> and the <a href="#">SBP On-Site Monitoring Form</a> forms are on the <a href="#">Onsite Monitoring</a> section of the DPI SNT website.</p> <p><u>Corrective Action:</u> Provide a statement of understanding that on-site monitoring is required to be completed prior to February 1 and include the position responsible for completing this.</p>

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Technical Assistance Entries:					
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
05/10/2023	3606		Administrative Review		FSD
<b>Comments</b>					
It is recommended that there be multiple staff members completing the administrative duties associated within the Child Nutrition Programs. Many districts across the state have several staff who assist their Food Service Director (FSD) with these tasks. This helps alleviate the administrative burden and allows the FSD to have more time to manage a successful kitchen and food service program. Hiring an administrative assistant or paying an already employed assistant who has Child Nutrition Program responsibilities for the time used to assist with the programs is an allowable cost to Fund 50, for more information on allowable costs please refer to the Expenditure Categories for Food Service AFR document located on the School Nutrition Financial Management webpage.					
05/09/2023	3580		Administrative Review		FSD
<b>Comments</b>					
If a household has only one source of income, or if all sources are received in the same frequency, the SFA takes the sum of all income sources and compares the household's total income to the IEGs. The SFA is not required to annualize these applications for eligibility.					
05/09/2023	3579		Administrative Review		FSD
<b>Comments</b>					
Policy 8510 - Wellness states that the assessment of the policy will be included on the district website, however it was not found. If the SFA intends for the public to have access to the assessment via the website, it should be uploaded.					
05/09/2023	3578		Administrative Review		FSD
<b>Comments</b>					
Kiel Area School District has a great dietary needs policy within 8500 - Food Service Policy. This policy states that the medical statement must be signed by a "qualified medical authority" it is recommended that the SFA explain who this is. In the state of WI, this is a health care provider that can write a prescription in this state. This will be a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner.					
05/09/2023	3577		Administrative Review		FSD
<b>Comments</b>					
Civil rights training, such as the <a href="#">Civil Rights webcast</a> , must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program including nonfood-service staff.					
05/09/2023	3576		Administrative Review		FSD
<b>Comments</b>					
All SFAs are required to distribute a Public Release before the start of the school year. The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available. Kiel Area only sent the Public Release to the tri-county newsletter. SFAs must annually distribute the Public Release to: Local news media Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.)) Local employment office Major employers contemplating or experiencing large layoffs SFAs are allowed to, but 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.					
05/09/2023	3587		Administrative Review		FSD
<b>Comments</b>					
Condiment usage is not monitored nor are portion sizes communicated to students. Please monitor your school's condiment usage and communicate appropriate portion sizes to students, as condiments can be a significant source of calories, saturated fat, and sodium. Promote appropriate serving sizes by adding signage at the condiment station and/or photos of the planned portion size of the condiments.					