

Administrative Review Report

Crivitz School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/30/2023	11/27/2023
On-Site Review	12/11/2023	12/12/2023
Site Selection Worksheet	10/30/2023	11/03/2023
Entrance Conference	12/11/2023	12/11/2023
Exit Conference	12/12/2023	12/12/2023

Commendations:

Thank you to the school staff members for being welcoming during the review. Thank you for being available throughout the on-site visit to answer questions. The food service director (FSD) was very receptive to feedback and eager to learn. The lunch servers were very friendly during the review and provide excellent customer service to the students. The kitchen was very clean and it was clear that food safety is valued by the servers.

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 nutritious meals. The director has many responsibilities in the school and does a great job overall managing the school meals programs. Thank you for being receptive to suggestions and having a desire to keep learning and improving the programs.

The district added the School Breakfast Program for the middle and high school students for the 23-24 school year. Breakfast is offered in a "grab and go" fashion from a mobile cart. There are many options available at breakfast so students can create customizable meals, including hot and cold options each day along with several types of fruit offerings. Great job offering breakfast to your students and continuing to tweak the breakfast cart setup and its offerings to fit the students' preferences.

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	<p>Flagged 12/21/2023 09:11 AM</p>	<p>Finding: The Annual Financial Report (AFR) for the 2022-23 school year has errors in need of correction.</p> <p>The allocations on the AFR for non-program foods do not appear to be accurate. The revenue allocated to non-program foods far exceeds the reported expenses for non-program foods. This is likely due to under allocation of expenses and/or overallocation of revenues. Please assess and reallocate non-program food revenues and expenses on the report so the values accurately reflect these items.</p> <p>Please see corresponding technical assistance section of this report.</p> <p>Corrective Action: Print a copy of the 2022-23 Annual Financial Report and manually update the appropriate sections. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the Online Services portal. If after December 31, the DPI accountant will make the adjustments in the system.</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	

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Corrective Action History	Flagged 12/12/2023 06:31 PM	<p>Finding: The SFA is tracking their Supply Chain Assistance (SCA) funds. However, the total SCA Funds on the tracker does not accurately represent all SCA Funds received to date. The SFA did not include SCA Funds received from Round 1.</p> <p>Corrective Action: After the upcoming Round 4 payment is received, update the total actual amount of SCA Funds received from Rounds 1-4 (including any reallocated funds received) in the tracker. Upload the updated tracker in SNACS.</p>
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	Flagged 12/21/2023 09:07 AM	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The food service director put in a good effort to have the tool completed. However, the tool submitted during the review was missing some of the required information and needs a few corrections.</p> <p>For the top nonprogram foods section:</p> <ul style="list-style-type: none"> The "number sold" column must reflect district-wide totals for the entire reference period (usually 5 consecutive school days). Specifically, make sure the number sold for milk reflects all extra milk/a la carte milk sold at all schools for the reference period---the paid milk breaks should also be counted here since those are non-program foods. Adult lunch and adult breakfast were not included and those are non-program foods. <p>For the bottom program foods section:</p> <ul style="list-style-type: none"> The "actual selling price" column should reflect the current weighted average price for student paid lunches and student paid breakfasts. The reduced-price breakfast should be \$0.30 -- not \$0.40. Make sure all of the correct reimbursement rates are listed in line with the correct meal types, prices, and counts. <ul style="list-style-type: none"> NSLP Free = \$4.33 NSLP Reduced = \$3.93 NSLP Paid = \$0.48 SNB Free = \$2.73 SNB Reduced = \$2.43 Paid Breakfast = \$0.38 Make sure the number sold column reflects the district-wide total for the entire reference period (usually 5 consecutive school days). <p>Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.</p> <p>Corrective Action: Go back through the submitted non-program food revenue tool. Double-check the items listed above and make corrections as necessary. Upload the corrected tool into SNACS. If the corrected tool indicates non-compliance with the non-program food revenue ration (i.e. the results are "red"), please provide a plan on how compliance will be achieved (such as by increasing the selling price of extra entrees).</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 12/12/2023 06:24 PM	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). See corresponding technical assistance portion of this report for additional guidance on this topic.</p> <p>Corrective Action: Utilizing the DPI template policy as a reference, (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures that will be adopted by the SFA and upload into SNACS. Describe how and when the procedures will be communicated and implemented in the SFA.</p> <p>Note: The SFA does not need to delay submission of this corrective action for board approval, but rather provide information on the procedures that are expected to be adopted and the plan for this.</p>
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 12/12/2023 06:28 PM	<p>Finding: The current Local Wellness Policy (LWP) does not include all of the required content. Specific language regarding the triennial assessment and inclusion of the full USDA non-discrimination statement is lacking. (7 CFR 210.31). See the corresponding technical assistance portion of this report for further suggestions regarding the LWP.</p> <p>Corrective Action: 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>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1006	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/12/2023 06:29 PM	<p>Finding: The SFA did not share the results of the Local Wellness Policy (LWP) assessment with the public per 7 CFR 210.31. Posting the completed assessment on the district's webpage would fulfill this requirement.</p> <p>Corrective Action: Notify the public of the results of the LWP assessment and upload a copy of the documentation to support this or the appropriate Web site URL linking to the assessment.</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	Flagged 12/21/2023 08:29 AM	<p>Finding: There were two applications (affecting 5 students) that were noted as benefit issuance errors. The error percentage was less than 3% so fiscal action is not required.</p> <p>One application with 3 student names had a different number listed in the household members box than number of names on the application. When there is a discrepancy like this, the application should not be approved until clarification is obtained from the household.</p>

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		<p>One application with 2 student names also had a discrepancy between the number listed in the household members box and the number of names listed on the application. The application was also missing an adult signature, which is required for income applications. When there is a discrepancy like this and/or a missing adult signature on an income application, the application should not be approved until clarification is obtained from the household.</p> <p>In both cases, the households' meal eligibility status would remain the same if the household size was assessed using the number of names listed or the number of household members listed in the box.</p> <p>Corrective Action: Contact the two households to confirm the number of household members. The Determining Official (DO) should make notes regarding this clarification on the application, initial, and date it. If a household member's name was missing from the application, the DO should record this missing name(s) on the application, initial, and date to document the updates. The necessary clarification regarding the household members for both applications was obtained during the on-site visit.</p> <p>However, for the application missing the signature, the DO must obtain the signature from an adult in the household. For corrective action, please upload into SNACS communication with the household requesting the signature and/or a copy of the signed application. If the DO cannot obtain the signature, then the application is incomplete, and the household would need to revert to "paid" status and the adverse action letter (uploaded into SNACS) would need to be sent to the household. Please make every effort to obtain the signature prior to reverting the household to "paid" status.</p>
Site Name	Crivitz Mid	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/12/2023 12:50 PM</p>	<p>Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable.</p> <p>Finding: The garden bar does not have specific signage indicating to students how much to take to meet the meal pattern to help make a reimbursable meal. Because vegetables credit towards the meal pattern, students need to know how much to take to make a reimbursable meal. Fruits and vegetables are measured by volume, so how many fit into a quarter cup, for example. The DPI SNT has garden bar signage on the signage page. The grab-n-go breakfast cart also needs additional signage to help students create their own reimbursable breakfasts.</p> <p>Corrective Action: Please take pictures of the garden bar and the grab-n-go breakfast cart with the updated new signage, please upload them to the documents tab in SNACS.</p>
Site Name	Crivitz Mid	
Form Name	Civil Rights (811-812)	
Question #	811	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/11/2023 07:45 PM</p>	<p>Finding: The most updated nondiscrimination "And Justice for All" poster is not located in the meal service area and/or is not visible to students (FNS Instruction 113). The location was acceptable, but the poster displayed was the 2015 version.</p> <p>Corrective Action: Display the most updated USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area. Provide a statement or image of how this requirement will be met. If corrected while onsite, no further action required.</p>

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Site Name	Crivitz Mid	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 12/11/2023 07:51 PM</p>	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p>
Site Name	Crivitz EL	
Form Name	Wisconsin School Day Milk Program	
Question #	1	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/21/2023 08:45 AM</p>	<p>Finding: In reviewing the Wisconsin School Day Milk Program (WSDMP) claim for the 2022-23 school year, it was discovered that all milk served at "milk break" for the 4K and Kindergarten was claimed for reimbursement. In WSDMP, ONLY children enrolled in the participating school in the participating grades (PK-5th grade allowed under program statute) that are eligible for free or reduced-price meals can be claimed for reimbursement. Further, it was noted that children eligible for reduced-price meals had been charged for their milk break when they should have received it for free under WSDMP statute.</p> <p>Milk claimed under WSDMP for 2022-23 to paid eligible students is not reimbursable and the SFA will not receive reimbursement for these milks.</p> <p>NOTE: This issue only affected the WSDMP claim for 2022-23 as the SFA used a different method for the claim and a different person completed this claim. Prior to 2022-23 the claim compilation process was different, thus there is not concern over ineligible milks being claimed in prior school years.</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> Refund any free or reduced-price eligible students that have been charged for their WSDMP "milk break" so far in the 2023-24 school year. While the FSD stated this was completed during the on-site visit, please upload into SNACS a statement and/or proof from the software system that this was completed. Using the appropriate reports from the software system, determine the correct number of milks that should have been claimed under WSDMP in the 2022-23 school year. Upload a copy of the report with the claimable milks indicated on the report. Submit a modification to the WSDMP claim for 2022-23. If the claim modification occurs before December 31, 2023, then the SFA can make the modification themselves in online services. If after this date, the claim modification must be submitted manually. Please refer to the "modifying a claim" section of the WSDMP claim manual. Submit documentation for the claim modification in SNACS. Provide a statement describing how the WSDMP will be correctly filed going forward to ensure only eligible milks are claimed for reimbursement.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
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12/21/2023	3956	Administrative Review	FSD		
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Comments

Non-Program Food Revenue	Created By	Created Date
<p>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 non-reimbursable foods and beverages (adult meals, a la carte, vending, catering, etc.) purchased using funds from the non-profit school food service account. Extra entrées and adult meals are non-program foods. Please refer to the Non-Program Foods In a Nutshell. Revenue available to support the production of reimbursable meals cannot subsidize the sale of non-program foods. SFAs are required to separate non-program food costs from program food costs and food revenues from program food revenues.</p> <p>On the AFR, the non-program foods revenue must reflect all revenue from the sale of non-program foods which includes a la carte, adult meals, extra entrees, and extra/cold lunch milk.</p> <p>On the AFR, the actual expenditures for non-program foods must be reported, including allocations across the different expense categories (labor, food, purchased services, etc.). Food expenditures must be the actual food costs associated with the sale of the non-program foods. This must be determined from sales reports, food cost data, and invoices. Labor expenditures must be determined based on actual labor time spent by food service staff on preparing and serving non-program foods. Ideally, labor allocations would be determined through an annual time study of staff time. For correcting the AFR, it is allowable as a one-time use to utilize the Expense Allocation Tool to reallocate some labor expenses to the category of non-program foods. This tool may always be used to help allocate purchased services, equipment, and "other" expenses that are shared between NSLP, SBP and non-program foods.</p> <p>Going forward, please ensure the district has sufficient procedures in place for allocating all categories of Fund 50 expenses to the appropriate programs on the AFR (i.e. NSLP, SBP, WSDMP, non-program foods, SFSP). Please review the AFR and non-program food resources found on the Financial Management webpage for more details and assistance on these requirements.</p> <p>The Annual Financial Report Manual is located on the DPI website to assist you with completing the AFR. All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance. The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year. The ending balance, on June 30, can never be a negative balance. A transfer must be made from non-federal funds to bring the ending balance to \$0.00. The categories of the AFR that should be addressed when tracking revenues and expenditures include:</p> <ul style="list-style-type: none"> • 'Labor' is expenses for all direct food service labor including both wages and fringe benefit costs. • 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc. • 'Food' is expenses for edible food items and beverages. • 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold. • 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc. • 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings. <p>When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools</p>		12/21/2023 7:58:13 AM

12/21/2023	3955	Administrative Review	FSD		
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Comments

Annual Financial Report – WSDMP	Created By	Created Date
<p>On the Annual Financial Report for Child Nutrition Programs, the revenue reported for WSDMP only includes the state reimbursement received for the program (which is recorded in the year it is received and not the year it is accrued). Revenue from paid households for their child's milk break is a revenue for non-program foods since those milks are not</p>		12/21/2023 7:57:08 AM

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technically part of WSDMP (i.e. they are not claimed for reimbursement) but are instead non-program foods. The expenditures for WSDMP should reflect the cost of serving the milk break for free to the free/reduced-price eligible children in the participating grades at the participating schools. Again, the milks served at milk break to the paid eligible students are considered non-program foods and are not technically part of the WSDMP.							
12/21/2023	3954		Administrative Review		AFR		
Comments							
Annual Financial Report – Equipment				Created By		Created Date	
On the Annual Financial Report for Child Nutrition Programs, the expenditure category for "Equipment" covers all nonexpendable equipment rentals and purchase costs. An individual item is considered nonexpendable if it costs over \$5000 per unit (or less if it is the district's policy) and is expected to last over one year. Equipment repair costs are considered purchased services. Expendable equipment costs (such as pans, serving utensils, trays, etc.) should be reported as "Other" expenditures.						12/21/2023 7:50:40 AM	
12/21/2023	3953		Administrative Review		FSD		
Comments							
Fund 50 and Fundraisers				Created By		Created Date	
Currently, student groups that want to purchase food for fundraisers can order food through the school nutrition account with the food vendor. Fund 50 pays the invoice to the vendor and then the group pays back Fund 50. No food service labor is involved in the current ordering process. It is highly recommended that the group(s) doing the fundraisers set up their own account with the food vendor, get separate invoices from the vendor, and pay the vendor directly from the appropriate account instead of continuing to run this through Fund 50. This would be the simplest and cleanest approach to managing the food service account. If the current practice will continue, then the purchases are considered "non-program foods" for Fund 50 and must be accounted as such and priced accordingly.						12/21/2023 7:47:06 AM	
12/21/2023	3952		Administrative Review		FSD		
Comments							
Milk Break Price on Webpage				Created By		Created Date	
On the food service webpage, the cost for milk break is listed as \$0.40. However, students in the grades that participate in WSDMP and qualify for free and reduced-price meals should be charged \$0.00. The website and any other communications regarding the price of milk break should be updated to accurately inform parents that milk break is free for qualifying students and \$0.40 for those that do not qualify for free/reduced-price meals.						12/21/2023 7:42:49 AM	
12/12/2023	3901		Administrative Review		FSD		
Comments							
Special Dietary Needs				Created By		Created Date	
<p>Special Dietary Needs - The USDA requires that schools participating in the National School Lunch Program and accepting federal dollars must accommodate all special dietary requests signed by a state authorized medical authority, written in an IEP and/or a 504 plan.</p> <p>Policy Requirements - At a minimum School Food Authorities (SFAs) participating in the USDA Child Nutrition Programs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Districts develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination. The School Nutrition Team has created a Special Dietary Needs Policy template which can be modified to fit the needs of the SFA. If the district already has a policy in place, it is recommended to compare this policy to ensure your policy includes all important information.</p> <p>Medical Statement - It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website. This template is available in English, Spanish, and Hmong. At a minimum the statement must include:</p> <ol style="list-style-type: none"> 1. an explanation of how the child's physical or mental impairment restricts the child's diet 2. the food(s) to be avoided 3. the food or choice of foods that must be substituted 4. The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI. This will be a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner 						12/12/2023 9:10:32 PM	

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A signed medical statement from a state authorized medical authority does not need to meet meal pattern requirements provided the statement supports food substitutions made outside of the meal pattern requirements.

SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or fall within Offer vs. Serve for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance. A signed medical statement is not needed in order to provide low fat or fat-free lactose-free milk, since this is an allowable milk type and thus does meet the meal pattern requirements.

Brand Names - In some situations, a State licensed healthcare professional may request a particular brand name of a product as a substitute on the medical statement. Generally, SFAs are not required to provide the specific brand requested, unless the brand name item is medically necessary. Instead, the SFA must provide a reasonable modification that accommodates the child's disability and provides equal opportunity for the child to participate in and benefit from the Program. In situations where the requested substitute is very expensive or difficult to procure or obtain, it would be reasonable for the SFAs to follow up with the family to see if a different substitute would be safe and appropriate for the child.

For example, a medical statement for a child with gluten intolerance may request a specific brand of gluten-free bread. If a modification request indicates a brand name item, in most instances, a generic brand is sufficient, unless the brand name item is medically necessary. This can be determined through the interactive process with the child's parent or guardian. In the example above, if the medical statement lists a specific brand of gluten-free bread, the SFA could check with the family to see if it would be safe and appropriate for the SFA to provide a different brand. In this instance, the family could then affirm the brand name change.

Timing of Medical Statements - Sometimes, SFAs receive a meal modification request outside the regular meal pattern before a child's parent or guardian is able to submit the required medical statement. If the SFA is aware a meal modification is needed, the SFA may not unduly delay providing the modification while awaiting the medical statement. Instead, the SFA should begin providing a reasonable modification to keep the child safe, and request the family provide a medical statement signed by a State licensed healthcare professional to support the meal modification as soon as possible. In this situation, school officials must document the initial interaction with the family where school officials first learned of the child's need for a modification. School officials should follow up with the family if the school does not receive the requested medical statement as anticipated and maintain a record of this contact. Schools should continue to follow up until the family submits a medical statement supporting the need for a modification.

When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator (see: Section 504/ADA Coordinator and Team) or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals. Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent or guardian for guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information.

Access to Medical Statements - The FSD should have copies of student medical statements that are on file for accommodating students with disabilities in the meal program. While this information is confidential, the FSD does have a legitimate "need to know" for this information since they are responsible for implementing the meal accommodation the student requires. The FSD should reference the actual signed medical statement for the exact meal accommodation information needed for the student to ensure it is fully implemented correctly in accordance with the request. If the medical statement supporting meal accommodations are only available to the school nurse and the summarized information is provided to the FSD, this allows for the possibility of miscommunication as information is passed along without the exact source documentation. The FSD should ensure they keep this information confidential once received.

Resources - The [Special Dietary Needs Flowchart](#) outlines the process of accommodation determination. The [USDA Q&A on Accommodating Special Dietary Needs](#) resource, the [USDA Special Dietary Needs Handbook](#), and [Q&As: Milk Substitution for Children with Medical or Special Dietary Needs](#) (Non-Disability) contain additional detailed information

12/12/2023	3899		Administrative Review	FSD			
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Comments									
Training Hours					Created By			Created Date	
The non-school nutrition staff member that serves as the business manager/accountant does not need to complete a certain minimum number of training hours annually, but they must receive sufficient job-specific training that supports their school nutrition duties. They should also receive the annually required USDA civil rights training.								12/12/2023 8:40:22 PM	
12/12/2023	3898		Administrative Review		FSD				
Comments									
Meal Prices on Computer Screen					Created By			Created Date	
During meal observation, it was observed that meal prices by eligibility (\$0.00, \$0.40, \$3.20) showed on the computer screen very briefly when students entered in their PINs. The screen is only visible to the POS operator and is not visible to students. While this may not necessarily constitute "overt identification," the SFA should work towards removing this information from the screen. These prices allow the POS operator/cashier to discern student's eligibility statuses and they likely do not really need to know this information. It is suggested to work with the software provider and staff members to modify how these prices appear on the computer screens.								12/12/2023 8:39:19 PM	
12/12/2023	3897		Administrative Review		AR				
Comments									
Community Eligibility Provision (CEP)					Created By			Created Date	
Under the new Community Eligibility Provision (CEP) final rule, the SFA qualifies for CEP. Some members of the community are interested in CEP, and the basics were discussed during the review. The SFA must carefully consider if CEP would be a good fit, with special consideration given to the potential financial impact. The SFA is encouraged to assess student data as of April 1, 2024 to see if CEP is something the district would like to pursue. SFAs must apply for CEP and be approved by DPI. Applications are accepted from May 1 - June 30, 2024. Please visit the CEP webpage for more details. Questions on CEP can be directed to the reviewer/CEP specialist. Please review the SNT bulletin from October 4, 2023 for details on the final rule and key CEP considerations. https://dpi.wi.gov/school-nutrition/school-nutrition-bulletin-2324-09 .								12/12/2023 8:38:25 PM	
12/12/2023	3896		Administrative Review		FSD				
Comments									
Public Release					Created By			Created Date	
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. SFAs must annually distribute the Public Release to: <ul style="list-style-type: none"> Local news media Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.) o 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 through a media outlet. Media outlets are allowed to establish a fee for publishing the public release, but the SFA may decline to pay for the service and forgo having the public release published. SFAs must maintain documentation of whom the public release was sent to, the specific materials distributed, and any other communications related to the public release distribution.								12/12/2023 8:37:17 PM	
12/12/2023	3895		Administrative Review		FSD				
Comments									
Unpaid Meal Charge Policy					Created By			Created Date	
Per USDA policy memo SP 46-2016 , no later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to unpaid meal charges. The unpaid meal charge policy must specifically explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in-hand to cover the cost of their meal at the time of service. If a child has money to purchase a reduced-price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay unpaid charges if the child								12/12/2023 8:36:13 PM	

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intends to use the money to purchase that day's meal. The SFA's current policy does not explicitly include this information and it should be updated to include it. Please refer to the In a Nutshell and other resources under the Unpaid Meals section of the Financial Management webpage .								
12/12/2023	3894		Administrative Review		FSD			
Comments								
Procedures for Discrimination Complaints				Created By		Created Date		
<p>While the SFA does have an extensive board policy related to discrimination, the policy does not fulfill the USDA requirements for processes for receiving and handling civil right complaints within the school meal programs. The existing policies do not contain the specific information needed related to the meal programs.</p> <p>Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.</p> <p>All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the Template Civil Rights Complaint Procedures to create written procedures.</p> <p>An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.</p> <p>If a complaint of discrimination is received at your district, the following procedures should be followed:</p> <ol style="list-style-type: none"> 1. Document the complaint using the USDA Program Discrimination Complaint Form. 2. Submit complaints within five days of receiving the complaint to: <ul style="list-style-type: none"> • Wisconsin Department of Public Instruction (DPI) <ul style="list-style-type: none"> ○ Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 ○ Fax: (608) 267-0363 ○ Email: jessica.sharkus@dpi.wi.gov 3. Maintain a Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members with a legitimate need-to-know. 						12/12/2023 8:35:10 PM		
12/12/2023	3893		Administrative Review		FSD			
Comments								
Beginning of the Line POS				Created By		Created Date		
<p>While point of service (POS) at the beginning of the line is typically not ideal, the SFA is using this POS model effectively. During meal observation, all students left the line with a complete reimbursable meal. The beginning of the line set up the SFA uses helps minimize unpaid meal charges as the cashier ensures the student has sufficient funds for non-program foods before going through the line.</p>						12/12/2023 8:13:42 PM		
12/12/2023	3892		Administrative Review		FSD			
Comments								
Limited English Proficiency				Created By		Created Date		
<p>Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand to diminish any language barriers to participation for individuals with LEP.</p> <p>The USDA Food and Nutrition Service (FNS) website offers many other foreign language translations of the Application for Free and Reduced-Price School Meals.</p> <p>Additionally, an "I Speak" resource document is available to help identify the primary language of non-English speakers. It uses a short phrase in each of the 49 languages that an applicant can check to indicate the language they speak. "I Speak" can help local educational agencies select the appropriate translation as well as ensure consistent and effective interaction with applicants who have limited English proficiency.</p> <p>The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.</p>						12/12/2023 8:13:04 PM		
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Verification – Sources of Income Verification					Created By			Created Date	
<p>During the verification process, all sources of income reported on the selected application must be verified. This means the household must submit acceptable documentation for each income source.</p> <p>If an income source is from an employer (i.e. the person is not self-employed), then a pay stub or documentation that shows the amount and how often pay is received should be submitted.</p> <p>If a person is self-employed, they should provide copies of documents such as ledger, tax books or Tax Form 1040 (i.e., Schedule C or Schedule F). Tax forms should not be used to determine the total household annual income, but rather only to support income for self-employed people.</p> <p>The verifying official (VO) is encouraged to contact DPI during the verification process if there is any question regarding tax forms or documentation received from a family.</p> <p>During the review, the household selected for verification submitted the first page of the tax form 1040 and the VO used the line for total gross income to determine the household's eligibility, which remained as "free" after review of this documentation. The highest income amount shown on this submitted tax form on another line would also have qualified the household for free meals. Technical assistance was provided.</p>								12/12/2023 8:12:30 PM	
12/12/2023	3890		Administrative Review		FSD				
Comments									
Verification – Confirmation Review					Created By			Created Date	
<p>During the confirmation review step of verification, the confirming official must review each application selected for verification to ensure the initial determination was accurate. This must be done by an individual other than the one who made the initial determination. Prior to any verification activity, the confirming official must review each application chosen for verification to ensure that the initial determination was correct. The confirming official should initial the application or use Verification Tracker Form to document that the confirmation was conducted.</p> <p>Be sure officials complete their required duties during the verification process and sign in the correct spot on the application. During the review it was noted the signatures for Verifying Official and Confirming Official were swapped, though the FSD explained that the confirmation review was completed as required by the appropriate people.</p>								12/12/2023 8:11:59 PM	
12/12/2023	3889		Administrative Review		FSD				
Comments									
Meal Applications					Created By			Created Date	
<p>The total household members box on a meal benefit application includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.</p> <p>Applications missing adult signatures must be returned to the household adult to obtain.</p> <p>If a household reports a case number and ineligible program name or multiple program names, the application should be considered incomplete until the discrepancies/errors are resolved.</p> <p>Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing (letter or e-mail). The determining official should document the details of the conversation plus date and initial the application updates. Reasonable effort should be made to obtain the missing information prior to denying the application.</p>								12/12/2023 8:11:26 PM	
12/12/2023	3888		Administrative Review		FSD				
Comments									
Civil Rights Training					Created By			Created Date	
<p>When completing the annually required civil rights training, be sure to go to the DPI Civil Rights webpage and use the currently posted training. There are occasional updates to trainings, including the civil rights training, so it is important to use the most updated version of the training each year.</p>								12/12/2023 8:10:45 PM	
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Offer vs Serve				Created By		Created Date	
It is critical that food service staff thoroughly understand Offer versus Serve (OVS) in order to ensure that all students select reimbursable meals. Please schedule additional OVS trainings for all staff involved in the school nutrition programs. OVS resources on WI DPI's Menu Planning webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/offer-versus-serve) may be used as training resources.						12/12/2023 1:00:08 PM	
12/21/2023	3957		Administrative Review		FSD		
Comments							
Local Wellness Policy				Created By		Created Date	
The district's Local Wellness Policy (LWP) contains content in the required areas of nutrition promotion and nutrition education but these areas could use improvement. These content areas were minimally incorporated into the policy. As the wellness committee continues to meet and the district modifies the policy, please focus on elaborating on these areas and strive to include specific goals the district has for these topics. Resources on the DPI LWP webpage can assist, specifically the LWP Policy Builder .						12/21/2023 12:46:40 PM	