

# Administrative Review Report

Marinette School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/26/2024	03/29/2024
On-Site Review	04/08/2024	04/09/2024
Site Selection Worksheet	02/26/2024	02/27/2024
Entrance Conference	04/08/2024	04/08/2024
Exit Conference	04/09/2024	04/09/2024

## Commendations:

### From the DPI Review Team:

Our sincere thanks to the administration and school nutrition staff of the Marinette School District. We appreciate the time and effort spent preparing for and participating in the administrative review process. Thank you for your availability during the on-site portion of the review and helping the DPI review team to gather the needed documentation and information. Thank you for what you do for kids!

For information on the USDA Child Nutrition Programs, visit the DPI [School Nutrition webpage](#). For in-depth technical assistance, including program links see the 2023-24 General Program Reminders which has been uploaded to the documents tab in SNACS.

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 offers [School Nutrition Summer Training](#) online and in various locations around the state. Find more information on these training opportunities on the DPI [School Nutrition Training webpage](https://dpi.wi.gov/school-nutrition/training) (<https://dpi.wi.gov/school-nutrition/training>).

### From the PHN:

A heartfelt congratulations to the exceptional Food Service team at Marinette School District for their outstanding dedication to ensuring students are nourished and thriving. Their unwavering passion for meeting (and exceeding!) meal pattern standards and prioritizing student well-being shines through in every aspect of their work. Their commitment to excellence and compassionate service is truly commendable. Thank you for your efforts in supporting the health and success of your students!

## Findings and Corrective Action:

Site Name

# Administrative Review Report

Marinette School District

Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	101	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged 03/28/2024 01:35 PM</p>	<p><b>Finding:</b> Language of Board Policy #8531 indicates incorrect language regarding determining of free and reduced eligibility.</p> <p><b>Corrective Action:</b> Provide a timeline of when the incorrect language will be removed or updated.</p>
Site Name		
Site Name		
Form Name	Verification (200 - 204)	
Question #	201	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged 03/27/2024 11:41 AM</p>	<p><b>Finding:</b> The Online contact does not have the correct person listed as the Verifying Official. The Verifying Official is the person who completes the verification process for the SFA.</p> <p><b>Corrective Action:</b> Update the contract to accurately reflect who the Verifying Official is (CE &amp; CC).</p>
Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	TA Log# exists	
Due Date		
Corrective Action History	<p>Flagged 03/28/2024 11:52 AM</p>	<p><b>Finding:</b> The SFA does not have an Unpaid Meal Charge Policy that clearly communicates to families what happens if they do not have cash in hand or money on account at time of purchase. All SFAs must have an Unpaid Meal Charge policy that is clearly communicated and distributed to the households, annually. (SP 46-2016)</p> <p><b>Corrective Action:</b> Provide a timeline of when the policy language will be updated and implemented.</p>
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		

# Administrative Review Report

Marinette School District

<p><b>Corrective Action History</b></p>	<p>Flagged 03/27/2024 12:35 PM</p>	<p><b>Finding:</b> Annual Financial Report revenues are recorded in incorrect revenue column; should be noted in "revenue excluding transfers" column.</p> <p><b>Corrective Action #1:</b> Download and complete a copy of the 2022-23 Annual Financial Report Template (annual-financial-report-template.pdf (wi.gov) with updates to show revenues in correct revenue column. Upload this document into SNACS.</p> <p><b>Corrective Action #2:</b> Review the Annual Financial Report webcast or manual on the DPI website and provide a statement of understanding.</p>
<p><b>Site Name</b></p>		
<p><b>Form Name</b></p>	<p>Maintenance of Non-Profit School Food Service Account (700 - 705, 777)</p>	
<p><b>Question #</b></p>	<p>777</p>	
<p><b>TA Log #</b></p>	<p>No TA Log# found</p>	
<p><b>Due Date</b></p>		
<p><b>Corrective Action History</b></p>	<p>Flagged 03/27/2024 12:36 PM</p>	<p><b>Finding:</b> The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed to receive the funds. The SFA is not aware of what the funds can be spent on, the funds are used on unallowable costs (milk from the SMP is included in the tracker).</p> <p><b>Corrective Action:</b> Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the allowable funds are spent.</p>
<p><b>Site Name</b></p>		
<p><b>Form Name</b></p>	<p>Civil Rights (800 - 807)</p>	
<p><b>Question #</b></p>	<p>805</p>	
<p><b>TA Log #</b></p>	<p>No TA Log# found</p>	
<p><b>Due Date</b></p>		
<p><b>Corrective Action History</b></p>	<p>Flagged 03/29/2024 09:49 AM</p>	<p><b>Finding:</b> Two areas of the Dietary Modifications Policy need to be changed.</p> <p>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.</p>

# Administrative Review Report

Marinette School District

		<p>2. SFA should not ask for a student's medical condition, but only how the condition or symptom affects the student's diet.</p> <p><b>Corrective Action:</b> 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> <p>1. Remove the language from the Dietary Modifications policy that indicates documentation must be submitted "will honor the request for 30 school days. Within 30 school days after receiving the initial request...". It is recommended to change this to "must be submitted from a health care provider with prescriptive authority in the State of Wisconsin."</p> <p>2. Change the items the certification must identify to:</p> <p>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>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action History</b>	<p>Flagged</p> <p>03/27/2024 04:41 PM</p>	<p><b>Finding:</b> Current Local Wellness Policy (LWP) has language inconsistent with WI-DPI requirement for the Triennial Assessment. WI-DPI requires use of WellSAT and the DPI-developed Report Card for the Triennial Assessment.</p> <p><b>Corrective Action:</b> Provide 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>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	126	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action History</b>	<p>Flagged</p> <p>04/09/2024 07:39 PM</p>	<p><b>Forty (40) free and reduced-price meal application determinations were reviewed, 5 errors were identified.</b></p> <p><b>Finding:</b> The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which</p>

# Administrative Review Report

Marinette School District

		applications need to be corrected.  <b>Corrective Action:</b> Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. <b>In SNACS Corrective Action Plan field, provide outcome of each error and date completed.</b>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	128	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	Flagged 04/09/2024 07:40 PM	<b>Finding:</b> The correct income conversion factors were not used when determining meal eligibility on free and reduced-price meal applications. Applications with one income frequency were annualized.  <b>Corrective Action:</b> Review the Income Conversions section of the <a href="#">Eligibility Manual</a> (page 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced-price meal application.
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	133	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	Flagged 04/09/2024 07:47 PM	<b>Finding:</b> Students were receiving DC meal benefits without documentation to support the benefit.  <b>Corrective Action:</b> From SFA-1, notify the 3 DC households of the correct eligibility/adverse action and upload a copy of the letter and documentation verifying the POS system has been updated with the correct eligibility into SNACS.
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	Flagged 04/08/2024 11:00 PM	<b>Finding:</b> SFA did not complete a confirmation review before verifying application(s); backs of verified application not signed by confirming official.  <b>Corrective Action:</b> Review the verification section of the

# Administrative Review Report

Marinette School District

		<a href="#">Eligibility Manual</a> and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>03/28/2024 02:13 PM</p>	<p><b>Finding #1:</b> The correct non-discrimination statement is not included on all program materials. The DC letter has the incorrect Non-Discrimination Statement.</p> <p><b>Corrective Action #1:</b> Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p> <p><b>Finding #2:</b> The non-discrimination statement was not included on all required program materials (missing from the LWP, District Policy #8531 and the student/family handbooks for ES, MS and HS).</p> <p><b>Corrective Action #2:</b> Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>03/28/2024 12:13 PM</p>	<p><b>Finding:</b> Documentation of school food service staff training is not being tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30 (missing fields for Date of Hire, Title/Position, FT or PT, and Category (FSD, Mgr or Staff).</p> <p><b>Corrective Action:</b> Add needed fields to tracker in use or include all training hours completed this school year for each school food service employee onto the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx">DPI professional standards training tracking tool</a> (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx</a>) or <a href="https://pstrainingtracker.fns.usda.gov/">USDA tool</a> (<a href="https://pstrainingtracker.fns.usda.gov/">https://pstrainingtracker.fns.usda.gov/</a>) and upload into SNACS.</p>
Site Name	Marinette Middle School	

# Administrative Review Report

Marinette School District

<b>Form Name</b>	Meal Counting and Claiming - Day of Review (317-321)	
<b>Question #</b>	317	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action History</b>	<p>Flagged</p> <p>04/09/2024 08:10 PM</p>	<p><b>Finding:</b> The SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. Prices for student meals are visible on the computer screen at the point of service that could be seen by students, which constitutes overt identification.</p> <p><b>Corrective Action:</b> Work with your software provider to ensure overt identification is not occurring or install screen protectors on monitors. Submit a statement documenting how this was corrected.</p>
<b>Site Name</b>	Marinette Middle School	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1407	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action History</b>	<p>Flagged</p> <p>04/09/2024 08:24 PM</p>	<p><b>Finding:</b> Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site-specific SOP's for (storing food, #10). Undated items out of case (chicken patties, burger patties) and opened bags without dates (sausage patties, mixed vegetables and corn dogs).</p> <p><b>Corrective Action:</b> Modify the SOP so that it aligns with actual practices or adjust practices to align with the SOP as written. Submit a copy of the updated SOP or a statement describing how practices will be adjusted to be compliant with the established SOP.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	Username
04/09/2024	4716		Administrative Review		Authorized Representative			
<b>Comments</b>						<b>Created By</b>		<b>Created Date</b>

## Community Eligibility Provision (CEP)

The Community Eligibility Provision (CEP) is a non-pricing meal service option for schools and school districts in low-income areas. CEP allows high-poverty schools and districts to serve breakfast and lunch at no cost to all enrolled students without collecting household applications. Schools and school districts interested in participating in CEP must apply. Approved CEP applications are valid for four years. Districts, groups of schools, or single school sites must have an Identified Student Percentage (ISP) of at least 25 percent based on Direct Certification (DC) data as of April 1st of the

# Administrative Review Report

Marinette School District

prior school year to be eligible. Note: DC codes S, T, O, E, G, and M can be included in the ISP. N and Z codes cannot be included in the ISP. Participating sites must agree to serve both breakfast and lunch at no cost to all students for up to four consecutive school years. For more information on CEP please see the [CEP webpage](https://dpi.wi.gov/school-nutrition/community-eligibility-provision) (https://dpi.wi.gov/school-nutrition/community-eligibility-provision), the [Planning and Implementation Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-08-2024.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-08-2024.pdf), the [ISP Calculation Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calculating-isp-worksheet.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calculating-isp-worksheet.pdf), [CEP Monthly Federal Reimbursement Estimator Tool](https://www.fns.usda.gov/sites/default/files/resource-files/SY23-24EstimatorCEP.xlsx) (https://www.fns.usda.gov/sites/default/files/resource-files/SY23-24EstimatorCEP.xlsx) and [CEP 101-The Basics webinar](https://www.fns.usda.gov/cn/community-eligibility-provision-101) (https://www.fns.usda.gov/cn/community-eligibility-provision-101). A completed estimated reimbursement tool has been provided with this report for your review.

4/9/2024 9:34:12 PM

04/09/2024	4715		Administrative Review		Authorized Representative			
------------	------	--	-----------------------	--	---------------------------	--	--	--

## Comments

Created By

Created Date

### Elimination of Reduced Price for Breakfast and/or Lunch

Another way to increase meal participation is to eliminate the reduced price for the School Breakfast Program and/or the National School Lunch Program. Like Universal Free Breakfast, the expense of the removal of the reduced price is an allowable cost to the nonprofit school food service account (Fund 50). Please see (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/elimination-of-reduced-price-breakfast.pdf) for more information on elimination of the reduced price for breakfast.

4/9/2024 9:16:44 PM

04/09/2024	4714		Administrative Review		Authorized Representative			
------------	------	--	-----------------------	--	---------------------------	--	--	--

## Comments

Created By

Created Date

### Universal Free Breakfast

Universal Free Breakfast is an allowable option in the School Breakfast Program where breakfast is served at no charge - free -- to any student who chooses to eat that day. However, the school will still claim each meal by the student's eligibility status and will receive federal reimbursement based the free, reduced and paid meals served. Many schools find that Universal Free Breakfast increases participation so drastically that they do not actually experience a loss from otherwise paying students. Universal Free Breakfast reduces the stigma attached to eating breakfast at school. It makes breakfast available to those students who may not want to participate in the program for fear of being labeled "poor." It also provides breakfast for those students who cannot afford the cost of a reduced-price breakfast and lunch. In addition, children who participate in Universal Free Breakfast tend to have improved attendance, less tardiness, and increased test scores. The quality of their diets also improves. While serving Universal Free Breakfast may increase labor needs, the overall labor costs per meal are actually less with Universal Free Breakfast than with traditional service methods. DPI has more information on its [Breakfast Resource website](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources), including a [Cost Calculator](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/ufb-cost-analysis-tool.xlsx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/ufb-cost-analysis-tool.xlsx).

4/9/2024 9:09:05 PM

04/09/2024	4760	410	Administrative Review	Marinette Middle School	FSD			
------------	------	-----	-----------------------	-------------------------	-----	--	--	--

## Comments

Created By

Created Date

### Cutting/Scoring of Fruit on self-Service Bar



# Administrative Review Report

Marinette School District

Based on onsite observation, it has been noted that a considerable number of students discard their whole apples or place them in the "share bin" immediately after leaving the meal service line. While this indicates that students are aware of the requirement to include at least 1/2 cup of fruit or vegetable in their reimbursable meal, it also raises questions about the acceptability of the fruit offerings for this student population. Experience from other locations suggests that students are more inclined to consume fruit when it is pre-cut, especially those with braces or limited time for eating. It's important to note that 138-count apples credit as 1 cup of fruit. By cutting the apples into halves or quarters, students could select smaller portions of fruit, potentially reducing food waste, while still building reimbursable meals. Similarly, quartered oranges have been found to be more widely accepted, as students may not have the time to peel an orange during lunch service and may find the orange peel residue inconvenient. To explore the potential benefits of offering pre-cut fruits, it is recommended that the school conduct a trial period lasting 1 to 2 weeks. During this time, the school can assess student acceptability, as well as any changes in food waste and associated costs. This trial will provide valuable insights into the effectiveness of pre-cut fruits as part of the meal service.

4/15/2024 11:57:17 AM

04/09/2024	4691	501	Administrative Review	Marinette Middle School	FSD			
------------	------	-----	-----------------------	-------------------------	-----	--	--	--

## Comments

Created By

Created Date

### Point of Service

The current checkout process at the Middle School presents challenges and lacks efficiency, sometimes making it difficult for Point of Service (POS) staff to accurately check each student's tray. Currently, students exit past two POS cashiers stationed at carts, each overseeing two lines on either side. However, students are not required to have their student ID cards, necessitating the POS cashier to pause both checkout lines to manually input a student's PIN when the ID is not available to be scanned. To address these issues and streamline the checkout process, it is strongly recommended to transition to two electronic PIN pad devices at each cart. These devices would enable students to input their own PINs, reducing the need for manual entry by the POS cashier. Alternatively, implementing a requirement for students to have their student IDs available for scanning would also be very beneficial. Either of these changes would promote orderliness by allowing students to present their trays in a methodical manner while providing the POS cashier with sufficient time to accurately process each meal. This will enhance the efficiency and effectiveness of the checkout process. Additionally, it's worth noting that the current checkout setup leaves room for potential issues, as students may exploit gaps in supervision to bypass the POS intentionally. Implementing the recommended changes will not only improve efficiency but also mitigate the risk of such incidents, ensuring greater accountability and adherence to meal program regulations.

4/9/2024 11:51:11 AM

04/09/2024	4690	500	Administrative Review	Marinette Middle School	FSD			
------------	------	-----	-----------------------	-------------------------	-----	--	--	--

## Comments

Created By

Created Date

### Breakfast Menu - Grain Choices

Streamlining breakfast grain offerings can enhance efficiency and clarity surrounding Offer Versus Serve (OVS) and the Point of Service (POS) processes. Currently, the menu features a variety of grain items with differing ounce equivalents, leading to inconsistency in the number of items required for a reimbursable meal. To simplify, consider designating specific days, such as Monday, Wednesday, and Friday, for 2-oz eq grain offerings. On alternate days, offer two 1-oz eq grain items. This approach ensures consistency and reduces confusion for students and POS staff, facilitating smoother meal transactions.

4/9/2024 11:47:06 AM

# Administrative Review Report

Marinette School District

04/09/2024	4689	404	Administrative Review	Marinette Middle School	FSD			
Comments					Created By	Created Date		
<p><b>Serving Line Signage</b></p> <p>During the onsite review, it was observed that the school effectively uses appropriately sized serving utensils on the fruit and vegetable garden bar. However, enhancing the student experience through informative signage detailing proper portion sizes could further support healthy eating habits. Consider incorporating signage that aligns with recommended serving sizes to empower students in making nutritious choices at lunch and beyond. For examples and resources, please refer to our <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage">Signage webpage</a> (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p>						4/9/2024 11:44:45 AM		
03/27/2024	4623	305	Administrative Review	ALL	FSD			
Comments					Created By	Created Date		
<p><b>Offer Versus Serve</b></p> <p>Offer Versus Serve (OVS) is a system that allows students to decline some offered menu items or components and still have a reimbursable meal. OVS is required for 9th – 12th grade students at lunch. It is optional (but encouraged) for K-8th grade students at lunch and K- 12th grade students at breakfast. At breakfast, schools must offer at least four food items from the three required components (fruit, grains, fluid milk) and students must select at least three food items, one of which is ½ cup fruit and/or vegetable. At lunch, schools must offer all five components and students must select at least three components, one of which is ½ cup fruit and/or vegetable. For specific quantities of what to offer each age/grade group, please refer to the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/meal-pattern-tables-components">meal pattern tables</a> (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/meal-pattern-tables-components).</p>						3/27/2024 11:46:27 AM		