

Administrative Review Report

Peshtigo School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/26/2024	03/29/2024
On-Site Review	04/10/2024	04/11/2024
Site Selection Worksheet	02/26/2024	02/27/2024
Entrance Conference	04/10/2024	04/10/2024
Exit Conference	04/11/2024	04/11/2024

Commendations:

From the DPI Review Team:

Our sincere thanks to the administration and school nutrition staff of the Peshtigo 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: Thank you to the incredible team at Peshtigo School District for their warm welcome, exceptional dedication, and unwavering commitment to their students' well-being. Throughout our visit, it was evident that every staff member goes above and beyond to ensure students receive nutritious meals and compassionate support. Your outstanding efforts in exceeding meal pattern requirements and creating a nurturing environment do not go unnoticed. Thank you for your remarkable work and ongoing dedication to your students' success!

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Findings and Corrective Action:

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	<p>Flagged 03/28/2024 04:49 PM</p>	<p>Finding: The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed to receive the funds. The tracking is including all milks off invoice. SMP and WSDMP milks are not allowable allocation of SCA funds.</p> <p>Corrective Action: 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 funds are spent.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/11/2024 11:17 AM</p>	<p>Finding: The Public Release was not distributed to the required locations including the media, local unemployment office, grassroots organizations and any major employers contemplating large layoffs in the area (7 CFR 245.5(a)(2)).</p> <p>Corrective Action: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	805	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/11/2024 11:23 AM</p>	<p>Finding: 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</p>

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	<p>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> <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>Corrective Action: 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 "will honor the request for thirty (30) school days. Within twenty (20) school days after receiving the initial request" and "or the dietary modification may be discontinued until such a statement is received." 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: 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>
Site Name	
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Question #	1600
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 04/11/2024 11:46 AM</p> <p>Finding: The SFA did not adequately inform households of the availability of the School Breakfast Program. At the beginning of the school year, and intermittently throughout the SFA must notify households of the availability of the School Breakfast Program (SBP) (7 CFR 210.12).</p> <p>Corrective Action: Submit a statement describing how households will be informed of the availability of the SBP. Please include the method of communication and time frame for distributing breakfast promotion materials.</p>
Site Name	
Form Name	Certification and Benefit Issuance (124 - 142)

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Question #	126	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/11/2024 10:26 AM</p>	<p>Forty (40) free and reduced-price meal application determinations were reviewed, two (2) errors were identified.</p> <p>Finding: 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 applications need to be corrected.</p> <p>Corrective Action: Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the outcome of the confirming data and date(s) to the Corrective Action text box.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	133	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/11/2024 10:28 AM</p>	<p>Finding: One student listed as directly certified is receiving meal benefits without documentation.</p> <p>Corrective Action: Notify the household of the correct eligibility and upload a copy of the letter and documentation verifying your system has been updated with the correct eligibility into SNACS.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/10/2024 02:14 PM</p>	<p>Finding: The SFA did not follow the proper steps when the confirmation review did not validate the original eligibility determination on applications selected for verification. If student is found on DC, the original application should not be verified and a new application selected.</p> <p>Corrective Action: Review pages 103-104 in the Eligibility Manual and submit a statement of understanding on how to</p>

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		review applications and eligibility when the confirmation review does not support the original eligibility determination.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/10/2024 09:33 PM</p>	<p>Finding #1: The correct non-discrimination statement (NDS) was not included on all program materials. Out of date nondiscrimination statement in Board Policy #8531 Free and Reduced.</p> <p>Corrective Action #1: Update program materials to include the correct non-discrimination statement. or provide a timeline of when this will be brought into compliance.</p> <p>Finding #2: The full, current non-discrimination statement is not included on all required program materials (missing from: Board Policy #8510 LWP and each school's handbook where child nutrition programs are mentioned). Flyer on "Why to Apply" for school meals is missing the shortened NDS.</p> <p>Corrective Action #2: Add the Nondiscrimination statement to required program materials or provided a timeline of when this will be brought into compliance.</p>
Site Name	Peshtigo High	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1105	
TA Log #	4740	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/11/2024 12:35 PM</p>	<p>Finding: Insufficient Smart Snacks compliance documentation and selling of non-compliant foods on campus during the school day via vending machines and fundraisers.</p> <p>Corrective Action Items:</p> <p>Item 1: Please provide a written statement detailing the designated individual responsible for overseeing Smart Snacks compliance at Peshtigo High School. This statement should also outline the process for monitoring compliance with Smart Snacks regulations for all food sales, including fundraisers and vending machines.</p>

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		<p>Item 2: To bring the vended offerings into compliance, please submit compliance tracking information for each product intended for sale in the vending machines. This information should include the nutrition facts labels with ingredient statements and the Smart Snacks calculator results (https://foodplanner.healthiergeneration.org/calculator/) for any prepackaged foods or beverages sold. Additionally, please submit a photo of the vending machines with these updated offerings.</p>
Site Name	Peshtigo High	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1407	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/10/2024 09:54 PM</p>	<p>Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with the what is outlined in the site specific SOP's for (Storing Refrigerated, Dry and Frozen Foods - SOP #10 - items open or out of original case are dated).</p> <p>Corrective Action: 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>
Site Name	Peshtigo High	
Form Name	Special Milk Program	
Question #	5	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/11/2024 05:37 PM</p>	<p>Finding: The milk counting and claiming system does not result in accurate milk counts. The point of service (POS) did not provide a reliable or accurate milk count due to counts not being taken as the student receives the milk.</p> <p>Corrective Action: Correct the POS to ensure accurate counts are tracked. Then submit 15 consecutive operating days of milk counts. Accurate counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</p>
Site Name	Peshtigo High	
Form Name	Wisconsin School Day Milk Program	

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Question #	4	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/11/2024 05:39 PM	<p>Finding: Milks are being claimed based on attendance counts/orders or another counting system rather than an appropriate point of service count. Point of service counts (POS) for the Wisconsin School Day Program (WSDMP) must be recorded as the students receives a milk. A "back out system" which indicates who did not take a milk, rather than who did take a milk is not allowable.</p> <p>Corrective Action #1: Submit a detailed statement, outlining how the school has changed the accountability system for claiming milk to include an approved POS.</p> <p>Corrective Action #2: Provide 15 days of WSDMP counts with the corrected counting system. Upload in SNACS.</p> <p>Corrective Action #3: Retrain staff on the new POS procedures. Upload documentation to support the training that was completed, and staff sign in sheet into SNACS.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	Username
04/11/2024	4740	1105	Administrative Review	Peshtigo High				
Comments						Created By	Created Date	

Vending Machines

At Peshtigo High School, vending machines and food/beverage-based fundraisers operate during the school day but are not under the oversight of the Food Service Department. Upon inspection of the vended products available, it was observed that the majority were noncompliant with Smart Snacks regulations. These included various items such as: Little Debbie snacks (Zebra Cakes, Cosmic Brownies, Unicorn Cakes, Honey Buns, Cookies-and-Cream Brownies, Birthday Cakes, and Oatmeal Cream Pies), candy (NutterButter bars, Haribo Gummy Bears, Mike-and-Ikes, Reese's Pieces, gum, Mentos, and LifeSavers), and other assorted individually-wrapped snack-style products (Oreos, granola bars, and savory snack mixes), among others. As a reminder, if vending machines are selling noncompliant products, they may only operate between thirty-minutes after the end of the instructional day and midnight (12:00AM).

It is essential to ensure that all food and beverage sales on the school campus during the school day meet both the Smart Snacks general standards and nutrient standards, unless the sales qualify for an exemption in accordance with the Smart Snacks Final Rule, which was published in the Federal Register on July 29, 2016, and provides science-based nutrition guidelines for competitive foods. More information is available on WI DPI's [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks) (<https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks>).

It is the responsibility of the SFA to track exempt fundraisers, ensuring compliance. This simply means keeping a list of each student organization that has a food/beverage fundraiser, noting the length of time and location of the fundraiser, ensuring that no organization has more than two fundraisers, and ensuring that each fundraiser is not more than two

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consecutive weeks. Tracking templates are available on the [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks) (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).

If an organization is selling foods or beverages that **meet** the Smart Snacks standards, this is considered a complaint fundraiser. These foods or beverages may be sold at any time and in any location; however, the organization must keep documentation on file that proves the compliance of the items sold. This may include nutrition facts labels for purchased foods or beverages, and recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.

If an organization is selling foods or beverages that **do not meet** the Smart Snacks standards, this is considered an exempt fundraiser (i.e., exempt from the Smart Snacks standards). Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length. Exempt fundraisers cannot occur in the meal service area during mealtimes and someone in the school must keep track of the exempt fundraisers.

We recommend using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) to assess compliance of products sold outside the reimbursable meals (https://foodplanner.healthiergeneration.org/calculator/). Simply answer a series of questions to see if the general and nutrition standards are met, then save the results for your records.

4/11/2024 12:34:59 PM

04/11/2024	4739	431	Administrative Review	Peshtigo High	FSD			
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Comments

Created By

Created Date

Production Records

It is essential to maintain accurate and comprehensive production records to ensure compliance with meal pattern requirements. Please continue efforts to work with kitchen staff to consistently and precisely document daily information. Onsite technical assistance was provided to address the recording of Purchase (Bulk) Units and Planned/Actual quantities prepared. This adjustment aims to better align production records with current kitchen practices and enhance accuracy in documenting food service operations.

4/11/2024 12:24:48 PM

04/11/2024	4738	412	Administrative Review	Peshtigo High	FSD			
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Comments

Created By

Created Date

Alternate Breakfast Service Model

It is strongly encouraged that the SFA explore the option of Breakfast After The Bell (BATB), both to reach more students and to increase revenue from a boost to the number of reimbursable meals sold. BATB can be structured in a variety of ways and tailored to best meet the needs of your students and staff. Most importantly, BATB ensures access to breakfast for all students, including those who may not arrive to school early enough to participate in the traditional breakfast in the cafeteria. Many schools utilize a Grab'n'Go style of service at the Middle and/or High School level for BATB. Students can quickly select a portable reimbursable meal during passing times. Some schools opt to extend the passing time between first and second periods to allow for a "Nutrition Break," which is another option to consider. With support from food service staff, administration, custodial services, and teachers, BATB can be executed with minimal-to-no impact to the regular school day. Visit our [School Breakfast Resources webpage](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) for more information on school breakfast models, online learning, marketing and promotion strategies and more (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) or reach out to our [School Breakfast Specialists](mailto:DPISBP@dpi.wi.gov) (DPISBP@dpi.wi.gov).

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								4/11/2024 12:23:24 PM
03/28/2024	4633	305	Administrative Review	ALL	FSD			
Comments								
						Created By	Created Date	
Visiting Students Visiting students can also be claimed. Schools can claim visiting students in one of two ways: Students can be claimed at the paid student rate and charged the student paid rate. Students can be claimed according to home school eligibility determination, but ONLY if copies of supporting information. (i.e., f/r applications, direct certification list, etc.) are provided to the school being visited. As a reminder when sharing information with another school, it is recommended that a disclosure statement be signed. If non-CEP student visits a CEP school include them in total meal count.								3/28/2024 3:54:58 PM
03/28/2024	4632	103	Administrative Review	ALL	Determining Official			
Comments								
						Created By	Created Date	
Carry Over For up to 30 operating days into the new school year (or until a new eligibility determination is made, whichever comes first) an individual child's free or reduced-price eligibility status from the previous year will continue within the same LEA. When the carryover period ends, unless the household is notified that their children are directly certified or the household submits an application that is approved, the children's meals must be claimed at the paid rate. Though encouraged to do so, the LEA is not required to send a reminder or a notice of expired eligibility.								3/28/2024 3:42:31 PM