

Administrative Review Report

Whitnall School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/03/2019	01/24/2020
On-Site Review	02/04/2020	02/05/2020
Site Selection Worksheet	12/03/2019	12/03/2019
Entrance Conference	02/04/2020	02/04/2020
Exit Conference	02/05/2020	02/05/2020

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- 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, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.usda.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.
- The [Child and Adult Care Food Program](https://dpi.wi.gov/community-nutrition/cacfp) (CACFP) helps provide funding for nutritious meals and snacks served to children and adults receiving day care. The CACFP also provides funding for meals served to children and youths residing in homeless shelters, and for snacks provided to youths participating in eligible after school programs. **At-Risk Afterschool Meal Programs** are community-based programs that offer enrichment activities for at-risk children and teenagers, after the regular school day ends, can provide free snacks and suppers through CACFP. For more information see [the DPI Community Nutrition team webpage](https://dpi.wi.gov/community-nutrition/cacfp) (<https://dpi.wi.gov/community-nutrition/cacfp>)
- [Child and Adult Care Food Program \(CACFP\) Information Sheet](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_information_sheet.pdf) (https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_information_sheet.pdf).

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Appreciations:

Thank you to the staff at the Whitnall School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questionnaire and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness and willingness of the staff to make changes to meet school nutrition program regulations. The DPI review team is confident that the Whitnall School District will continue to improve their knowledge and operation of child nutrition programs.

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Findings and Corrective Action:

Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	113	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/04/2020 07:02 PM</p>	<p>Finding: SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. The SFA does not have systems in place to ensure only authorized individuals, with a "legitimate need to know" have access to the benefit issuance system.</p> <p>CA1: Review who within the district has access to the benefit issuance system. Determine who has a "legitimate need to know" and upload a), the final list of which positions will maintain access and b), a signed Disclosure Agreement for an Individual for that person into SNACS.</p> <p>CA2: Provide a statement of the procedures that will be used to ensure only those with a "need to know" will have access to the benefit issuance system or eligibility information.</p>
Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/28/2020 07:46 AM</p>	<p>Finding: The SFA has an Unpaid Meal Charge Policy in place. The language of that policy must be brought into compliance for Civil Rights and funding information.</p> <p>CA: Provide a timeline of when the policy will be updated, implemented and how households will be notified annually.</p>
Site Name		
Form Name	Paid Lunch Equity (706 - 708)	
Question #	706	
TA Log #	TA Log# exists	
Due Date		
Corrective Action History	<p>Flagged 01/27/2020 04:10 PM</p>	<p>Finding: The Paid Lunch Equity (PLE) Survey was not completed.</p> <p>CA: Complete the PLE survey for 2019-2020 and upload the email confirmation of having done so into SNACS.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	

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Corrective Action History	Flagged 01/27/2020 05:51 PM	Finding: Nonprogram foods cannot be in negative on Annual Financial Report. Ending balance does not match PI-1505. CA 1: Provide a statement of understanding regarding Nonprogram food balance on Annual Financial Report—it cannot be negative. CA 2: Manually correct 2018-2019 AFR and upload a copy of the updated report to SNACS. Once approved, the DPI accountant will make adjustments to online report.
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	710	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/29/2020 08:12 AM	Finding: SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14. CA 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5-day reference period from the current school year. CA 2: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/28/2020 08:36 AM	Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). CA: Provide a timeline for when a school meal program complaint policy will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/28/2020 08:25 AM	Finding: Current Local Wellness Policy (LWP) does not include all of the required content (missing content on: Foods provided but not sold, Food and Beverage Marketing, Nutrition Promotion, and

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		Triennial Assessment) (7 CFR 210.31). CA: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
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 02/04/2020 02:24 PM	278 free and reduced price meal application determinations were reviewed, 4 errors were identified. This is a 1.44% error rate and is below the 5% error rate requiring an independent review of applications and also below the 3% threshold for fiscal action. 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. CA: 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. Completed onsite. No further action needed.
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/04/2020 04:12 PM	Finding: The SFA did not follow the proper steps in verification; the confirmation review did not validate the original eligibility determination on applications selected for verification, per the required procedure. CA 1: Review pages 103-104 in the Eligibility Manual, CA 2: Submit a statement of understanding on how to handle applications when the confirmation review does not support the original eligibility determination and CA 3: Watch the Verification webinar and submit the quiz questions/answers to SNACS.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 02/04/2020 06:44 PM	Finding: The non-discrimination statement in the DC notification letter was not in the correct format per USDA guidelines. CA: Update the DC Letter to show the correct non-discrimination statement. Upload into SNACS a copy of materials updated.
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/05/2020 09:38 AM	Finding: The SFA had a copy of the food safety plan at each school. Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan at all schools should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13). CA: Update the food safety plan at HC to include: a) Page one of the Facility Description from the food safety template and, b) Provide a statement of understanding regarding the use of Time as a Public Health Control for all TCS foods held out of electric temperature control. Upload both to SNACS.
Site Name	Hales Corners EI	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	317	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/04/2020 12:04 PM	Finding: 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 can be seen by students; which constitutes overt identification. CA: 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.
Site Name	Whitnall High School	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	317	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/05/2020 11:53 AM	Finding: SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. Prices for student meals are visible

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		on the computer screen at the point of service that can be seen by students; which constitutes overt identification. CA: 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.
Site Name	Hales Corners EI	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/05/2020 10:26 AM	Finding: Production Records Missing Required Field. Current production records lack a field for planned and actual quantity prepared in purchase units. Corrective Action: Submit a statement that details how the SFA plans to alter the production record template to comply with Production Record Requirements, which can be found at https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records While onsite, the SA noted that the production record template is generated through the SFA's nutrition management software, making the editing process more difficult. This was discussed with the FSD. Hand writing a "planned/actual quantity in purchase units" column onto the current production record is sufficient, particularly while working with the software support team to add the necessary column.
Site Name	Hales Corners EI	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/05/2020 10:04 AM	Finding: Quantity Shortage**. There was a weekly grain shortage at lunch during the week of review. Only 6.75 oz eq grain was offered over the course of the week, which does not meet the minimum 8.0 oz. eq. grain requirement for the K-8 meal pattern. Corrective Action: Submit a statement explaining how this weekly grain shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation. **Please note that on future Administrative Reviews, repeat violations of minimum quantity shortages may result in fiscal action.
Site Name	Whitnall High School	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1105	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged	02/05/2020 12:00 PM	<p>Finding: Gatorade does not meet Smart Snacks standards and is not allowable. More information can be found on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).</p> <p>Corrective Action: Submit a statement that outlines what the SFA will do with this product to comply with the Smart Snack regulations. Additionally, please address how the SFA intends to assess compliance for foods sold on school grounds but outside the purview of the school food-service department. Include who will be in charge of assessing and maintaining compliance as well as the manner in which product compliance will be assessed.</p>
Site Name	Hales Corners EI		
Form Name	Food Safety, Storage and Buy American (1404-1411)		
Question #	1406		
TA Log #	TA Log# exists		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged	02/04/2020 12:14 PM	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. Corrected onsite, no further action required.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/10/2020	1588		Administrative Review		FSD			
Comments								
						Created By	Created Date	
305k: USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy should include, see the Unpaid Meal Charges In a "Nutshell" . For a comprehensive overview including best practices and helpful materials, see the Unpaid Meal Charges section of the DPI SNT website or the USDA Unpaid Meal Charges webpage . • Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless paid households have chosen to donate those funds to the school food service account. Funds remaining in a reduced student account cannot be donated to the school food service account. Any funds left in a student meal account, which cannot be returned, must be turned over to the Wisconsin Department of Revenue as unclaimed property.								2/10/2020 1:17:38 PM
02/10/2020	1587	1406	Administrative Review	Hales Corners EI	FSD			
Comments								
						Created By	Created Date	
Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year, which typically includes a food safety inspection and a review of the site's Food Safety								2/10/2020 12:06:58 PM

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Plan. The most recent food safety inspection report must be posted in public view.										
02/10/2020	1586		Administrative Review		FSD					
Comments										
					Created By	Created Date				
The meal counting system must prevent overt identification of students receiving free and reduced-price benefits. SFAs must ensure meal prices and/or benefit status is not visible on the computer screen or point of service (POS) documents where they can be viewed by students.						2/10/2020 12:04:51 PM				
02/10/2020	1585	1400	Administrative Review	ALL	FSD					
Comments										
					Created By	Created Date				
SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria. All schools must have a comprehensive, site-specific food safety plan on-site, which includes HACCP process 1, 2, and 3 items; applicable SOPs; a list of equipment; and a list of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the SNT Food Safety webpage. All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan. A Flash of Food Safety is a video series designed to help school nutrition professionals understand and apply safe food practices. The Office of Food Safety website includes additional food safety resources. Time as Public Health Control--Time/temperature Control for Safety (TCS) foods may be held without temperature control if specific conditions are met under a practice called "Time as a Public Health Control." Please refer to the Wisconsin Food Code Fact Sheet: Time as a Public Health Control for detailed procedures regarding this practice. TCS foods include: Milk and dairy products, Shell eggs, Meat (beef, pork, and lamb), Poultry, Fish, Shellfish and crustaceans, Baked potatoes, Heat-treated plant food, such as cooked rice, beans, and vegetables, Tofu and other soy protein, Sprouts and seed sprouts, Sliced melons, Cut tomatoes, Cut leafy greens, Untreated garlic-and-oil mixtures and Synthetic ingredients, such as textured soy protein in meat alternatives. To utilize "Time as a Public Health Control," the school must have a corresponding SOPs in the site-specific food safety plan. Template SOPs are available on the SNT Food Safety webpage. • If any TCS food is held without temperature control during service, including TCS foods on garden bars, all leftover TCS food must be discarded.						2/10/2020 12:01:19 PM				
02/10/2020	1584	803	Administrative Review	ALL	FSD					

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Comments					Created By	Created Date
All SFAs must have procedures (written procedures preferred) or policies in place for handling civil rights complaints in regard to discrimination in the National School Lunch Program (NSLP) and School Breakfast Program (SBP). A 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. Please refer to the USDA Program Discrimination Complaint Form for assistance in filing these complaints.						2/10/2020 11:56:39 AM
02/10/2020	1583	1000	Administrative Review	ALL	FSD	

Comments					Created By	Created Date
<p>The LWP requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires SFAs to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017. SFAs are required to retain basic records demonstrating compliance with LWP requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, Wisconsin Team Nutrition has several wellness policy resources available, including a toolkit, a wellness policy builder, and wellness policy report card. SFAs are required to have language in their LWP that relates to all the content areas listed in the LWP Checklist found on the Local Wellness Policy section of the DPI SNT website. This checklist includes sample policy statements (italicized) under each content area.</p> <p>Sample Language: Policy Leadership: The superintendent shall implement and ensure compliance with the policy by leading the review, update, and evaluation of the policy. Public Involvement: The district will invite a diverse group of stakeholders to participate in the development, implementation, and periodic review and update of the policy. School Meals: All meals meet or exceed current nutrition requirements established under the Healthy Hunger-free Kids Act of 2010. Foods sold outside of school meals program: All food and beverages sold outside of the school meal programs shall meet the standards established in USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule. Foods provided but not sold (e.g., class parties, class snacks, rewards): The district encourages foods offered on the school campus meet or exceed the USDA Smart Snacks in School nutrition standards including those provided at celebrations and parties and classroom snacks brought by staff or family members. Non-food celebrations will be promoted and a list of ideas is available to staff and family members. Food and Beverage Marketing: Schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule. Nutrition Education: Teachers shall integrate nutrition education into other classroom subjects, such as math, science, language arts, social sciences, and elective subjects. Nutrition Promotion: School nutrition services shall use the Smarter Lunchroom Self-Assessment Scorecard to determine ways to improve the school meals environment. School nutrition services shall implement at least [Insert Number] Smarter Lunchroom techniques at each school. Physical Activity: The district shall</p>						2/10/2020 11:55:28 AM

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provide students with physical education, using an age-appropriate, sequential physical education curriculum consistent with national and state standards for physical education. The district shall also provide opportunities for students to participate in physical activity in addition to physical education. Other School-Based Strategies for Wellness: The district will offer [Insert Number] family-focused events supporting health promotion (e.g., health fair, nutrition/physical activity open house) each year. Triennial Assessment: The district will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school is in compliance with the policy and how the policy compares to a model policy, as established by the U.S. Department of Agriculture. Update/Inform the Public: The district will actively inform families and the public about the content of and any updates to the policy through the school website and Board of Education meetings.							
02/10/2020	1582		Administrative Review		FSD		
Comments							
				Created By		Created Date	
Nonprogram foods include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, and food service operated vending machines. • All costs associated with nonprogram foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. This ensures nonprogram foods are not supported by reimbursable meals. • SFAs are required to annually complete the DPI Nonprogram Food Revenue Tool or the USDA Nonprogram Food Revenue Tool. The DPI tool is recommended since it aids in calculating prices of nonprogram foods to ensure USDA revenue requirements are met as found in Nonprogram Foods Revenue Rule SP-20-2016 • A nonprogram foods deficit must receive a transfer of non-federal funds into the nonprofit food service account. • SFAs that sell only nonprogram milk and adult meals are exempt from completing the Nonprogram Food Revenue Tool. Adult Meals • Food service programs must price adult meals above the overall cost of the student meals. Adult meal pricing must follow the minimum pricing guidelines in Food Nutrition Services Instruction 782-5. • A Wisconsin Adult Meal Pricing Worksheet has been developed to assist the SFA in pricing adult meals.						2/10/2020 11:52:57 AM	
02/10/2020	1581		Administrative Review		FSD		
Comments							
				Created By		Created Date	
• 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. • When a student deposits funds in their lunch account, which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the food service fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your AFR. • The ending balance on June 30 from the previous year needs to be the beginning						2/10/2020 11:46:05 AM	

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<p>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 school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status. • The categories of the AFR that should be addressed when tracking revenues and expenditures include: 'Labor' which is the wages and fringe benefits for employees directly working for the federal child nutrition programs. '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. 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc. 'Nonprogram Foods' are 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. When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is actually 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. • Revenues and expenses for the Wisconsin School Day Milk Program should be allocated as follows: Revenues are only the state reimbursement. Expenses are only the milk expense for free and reduced priced students. Revenues and expenses for paid students should be recorded under non-program foods.</p>						
02/05/2020	1559		Administrative Review	FSD		
Comments					Created By	Created Date
<p>It was noted during onsite observation that the elementary students are allowed to select excessive portions of Mandarin oranges. The intent of the NSLP is to serve students nutritiously balanced meals and teach them healthy habits to last a lifetime. Consistently allowing larger portions than necessary does not aid in teaching students good nutrition or eating habits. This practice also drives up food costs and may impact the dietary specifications. Consider adding a sign that indicates how many scoops a student may select as part of a reimbursable meal: "One scoop, please!" Additionally, reinforcement from line staff and teachers will help students select appropriate portion sizes and reduce both the food waste and food costs.</p>						2/5/2020 1:18:41 PM
02/05/2020	1558		Administrative Review	FSD		
Comments					Created By	Created Date
<p>Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. These records should be reviewed and updated at least twice per year and as new products are purchased. Additionally, assess the crediting documentation to ensure that all necessary crediting information is available and accurate.</p>						2/5/2020 1:11:22 PM

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One product, the Ruiz Maple flavored Egg & Turkey Sausage Tornos, contained inconclusive information regarding the creditable portion of meat/meat alternate in the product. The grain portion of the product had sufficient information in order to credit it towards the SBP and there was no negative impact to the quantity of daily or weekly grain offered for the week of review.								
02/05/2020	1557		Administrative Review		FSD			
Comments								
					Created By	Created Date		
Onsite NSLP observation noted that a majority of elementary students had difficulty finishing their lunches before the end of the allotted lunch period. It could be beneficial to students to elongate the lunch period, if possible. If this is not possible at this time, alternate solutions are encouraged. One possible solution would be to shorten the length of time students spend in the lunch service line. Consider implementing a different Point of Sale (POS) system such as a pin-pad. Currently, line staff are both serving and then scanning each student through a multi-step process. The time saved during check out will help relieve the lunch line bottleneck and provide students a few more minutes to enjoy their lunches.							2/5/2020 12:54:58 PM	
02/05/2020	1556		Administrative Review		FSD			
Comments								
					Created By	Created Date		
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 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 for more information on school breakfast models, training webcasts, marketing and promotion strategies and more (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) or reach out to our School Breakfast Specialists (DPISBP@dpi.wi.gov).							2/5/2020 12:48:40 PM	
02/05/2020	1555	1106	Administrative Review	Whitnall High School	FSD			
Comments								
					Created By	Created Date		
No competitive foods or beverages are sold at Whitnall High School as part of fundraisers. If any food or beverage-based fundraisers sales occur in the future, the items must either be in compliance with the Smart Snacks guidelines or must qualify as an exempt fundraiser. Someone at each school must be responsible for documenting compliance of exempt fundraisers and any other food/beverage sales. You can find fundraiser							2/5/2020 12:05:34 PM	

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tracking tools on our Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks)										
02/05/2020	1554	1105	Administrative Review	Whitnall High School	FSD					
Comments										
						Created By	Created Date			
The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. This includes beverages and snacks in vending machines on school grounds. More information is available on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).										2/5/2020 11:52:52 AM
02/05/2020	1553	1104	Administrative Review	Whitnall High School	FSD					
Comments										
						Created By	Created Date			
Coffee drinks are allowable beverages at the high school level. Accompaniments such as cream and sugar must be included in the nutritional analysis of the coffee drinks. The calories of the coffee, cream, and sugar needs to be added together when determining if the beverage meets the guidelines. See the Coffee as a Smart Snack flowchart for more guidance: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/coffee-smart-snacks.pdf Beverage Guidelines: - Calorie-free beverages (black coffee) - <5 calories per 8 fl. oz.; =10 calories per 20 fl. oz. - Maximum serving size: 20 fl. oz. - Lower-calorie beverages (coffee with cream and/or sugar) - =40 calories per 8 fl. oz.; =60 calories per 12 fl. oz. - Maximum serving size: 12 fl. oz. To determine if coffee drinks are compliant, utilize the Smart Snacks Product Calculator (https://foodplanner.healthiergeneration.org/calculator/)										2/5/2020 11:50:12 AM
02/05/2020	1551	500	Administrative Review	Whitnall High School	FSD					
Comments										
						Created By	Created Date			
During onsite observation, it was noted that some students built reimbursable meals with multiple 2-oz eq grain/entree options (all 2-oz eq breakfast entrees are planned as 2-item foods). This impacts food costs, dietary specifications, and OVS at Point-of-Sale (POS). Consider limiting students to one 2-oz eq entree per reimbursable meal and charging the second entree as a non-program food purchase. This information should be relayed in a clear and concise manner to all POS staff.										2/5/2020 11:07:55 AM
02/05/2020	1548	409	Administrative Review	Hales Corners EI	FSD					
Comments										
						Created By	Created Date			
The production record template currently in use lacks required information (planned and actual quantity used, in purchase units). A copy of the Production Record Requirements and templates may be found on										2/5/2020 10:16:20 AM

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our webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records). Additionally, please continue to work with staff to record accurate information on all parts of the production record. Current production records are lengthy and a few data points were mislabeled on the documentation submitted for week of review. Consider revising the production record template for ease of use. Optional production record templates may be found on our webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).												
02/05/2020	1546	410	Administrative Review	Hales Corners EI	FSD							
Comments												
						Created By	Created Date					
When multiple entrees are offered, each entree must be considered as a separate service line and be evaluated for meal pattern compliance individually. Salads and bistro meals were offered daily during the week of review as an alternate to the hot entree option. These meals provide between 1-2 oz eq grain daily and always meet the daily minimum requirements for the K-8 meal pattern (1 oz eq). However, over the course of the week, these students must be offered at least 8 oz eq grains, which is the minimum weekly K-8 meal pattern requirement. When each entree is evaluated for it's contribution to the weekly grain totals, students were offered a minimum of 6.75 oz eq grains during the week of review, 1.25 oz eq shy of the minimum requirement. Options to augment the quantity of grains served in select meals were reviewed onsite with the FSD with the most feasible option being the addition of a snack-type cracker to the Bistro meals served on Mondays and Wednesday; however, the final solution to this shortage lies at the discretion of the SFA and FSD.								2/5/2020 10:01:01 AM				
02/04/2020	1542	1601	Administrative Review	ALL	FSD							
Comments												
						Created By	Created Date					
SFAs must inform families of the availability of reimbursable breakfasts served under the School Breakfast Program (SBP) at the beginning and throughout the school year. The goal of providing school breakfast outreach is to increase participation in the SBP. A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods: Promotion of the summer meals locator on the DPI Summer Meals webpage, Promotion of calling 211 to locate meals in the area, Promotion of the ability to text 'food' to 877-877 to locate meals in the area and Promotion of the Summer Food Service Program webpage .								2/4/2020 9:03:25 PM				
02/04/2020	1541	1217	Administrative Review	ALL	FSD							
Comments												
						Created By	Created Date					
Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. A summary of the training								2/4/2020 8:57:32 PM				

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requirement is provided in this " In A Nutshell- Training " document. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.). SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. The DPI Professional Standards Tracking Tool or the USDA Professional Standards Tracking Tool are encouraged but not required.									
02/04/2020	1540	801	Administrative Review	ALL	FSD				
Comments									
					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: 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, and 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.								2/4/2020 7:37:59 PM	
02/04/2020	1539	810	Administrative Review	ALL	FSD				
Comments									
					Created By			Created Date	
<ul style="list-style-type: none"> •When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement, which was updated in 2015. •When space is very limited, such as on the printed menus, the abbreviated statement may be used, "This institution is an equal opportunity provider." Either of these statements must be in the same size font as the main text in the document and the format cannot be altered. 								2/4/2020 7:26:44 PM	
02/04/2020	1538	208	Administrative Review	ALL	FSD				
Comments									
					Created By			Created Date	
<ul style="list-style-type: none"> •When an application(s) is chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application. •After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications selected [7 CFR 245.6a(e)(2)]. Applications may be replaced when the LEA believes the household would be unable to satisfactorily respond to the verification request. This action should be documented. •When a household is selected for verification, the LEA must inform the household, in writing, of its selection and must provide a list of the documents or other forms of evidence the household must submit to the LEA. •When a household is selected for verification, it must provide "sources of information" to the LEA to confirm current income or participation in a categorically eligible program. According to 7 CFR 245.6a(a)(7), sources of information may include written evidence, collateral contacts, and systems of records. 								2/4/2020 7:23:54 PM	

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•Acceptable documentation of income or receipt of assistance from any of the following sources may be provided for any point in time between the month prior to application and the time the household is required to provide the documentation. •Households may provide pay stubs with income from employment. If a weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient. If the household submits a pay stub including overtime, the determining official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income without overtime. •The LEA must make at least one attempt to contact the household when the household does not adequately respond to the request for verification [7 CFR 245.6a(f)(6)]. “Non-response” includes no response and incomplete or ambiguous responses that do not permit the LEA to resolve children’s eligibility for free and reduced price meals. The required follow-up attempt may be in writing (mail or e-mail) or by telephone or text message. •When a benefit eligibility status increases, the change must take place within three days. When a benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures. •According to 7 CFR 245.7(b)(1), when a household appeals a reduction or termination of benefits within the 10 calendar day advance notice period, the LEA must continue to provide the benefits for which the child was originally approved, until a final determination is made. •The LEA may continue to claim reimbursement at the original level during this period. When a household does not request an appeal during the 10 calendar day advance notice period, benefits must be reduced or terminated no later than 10 operating days after the notice period. If the hearing official rules the child’s benefits must be reduced, the actual reduction or termination of benefits must take place no later than 10 operating days after the hearing official’s decision. •Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year, and schools should remind families their children may become eligible for meal benefits if the household unit experiences a change in financial circumstances (i.e., household size goes up or income goes down). However, if benefits to a household have been terminated because of failure to complete the verification or verification for cause process and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in Assistance Programs at the time of reapplication [7 CFR 245.6a(f)(7)]. These are not considered new applications. •Apart from the required verification of a specified number of approved applications, regulations at 7 CFR 245.6a(c)(7) require LEAs to verify any questionable application including, on a case-by-case basis, verifying any application for cause when the LEA is aware of additional income or persons in the household. This is known as “verification for cause.” •The standard sample size for verification must be used by an LEA unless the LEA qualifies to use an alternate sample size. Instructions for standard and alternate sample sizes can be found in the Eligibility Manual.

02/04/2020	1537	101	Administrative Review	ALL	FSD			
Comments						Created By	Created Date	
•Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the							2/4/2020 7:16:45 PM	

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<p>application. •A child is eligible for free or reduced-price meal benefits on the date their eligibility is determined by the Determining Official. Aside from the approval date, Determining Officials must record the level of benefits for which the child(ren) is approved and sign or initial and date the application. •When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the Income Eligibility Guidelines (IEG) one would look at the amount of their income under the column indicating that stated frequency. •When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would thus become \$0 for the income on the application. The verification webpage includes examples of resources on current tax forms. These forms indicate which lines should be used in reporting income from self-employment or farming. ?The total household member size box 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. •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. Applications missing signatures must be returned to the household adult to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.</p>								
02/04/2020	1536	131	Administrative Review	ALL	FSD			
Comments						Created By	Created Date	
Households with children who are denied free or reduced price meal benefits must receive prompt, written notification of their denial. The notification must advise the household of reason for denial of benefits, right to appeal, instructions on how to appeal and ability to reapply for free and reduced price benefits at any time during the school year. (7 CFR 245.6)							2/4/2020 6:40:56 PM	
02/04/2020	1532	19	Administrative Review	Hales Corners EI	FSD			
Comments						Created By	Created Date	
Although standardized recipes were in place for all menu items during the day of onsite review, some staff members were not closely following these recipes. Standardized recipes have been tried, tested, evaluated, and adapted to your food service operation. They are intended to be followed exactly to produce a consistent, quality product that credits a specific way. Continue working with staff to follow recipes exactly as written. If measuring a food for each meal served becomes too time- or labor-intensive, a sample reference of a component may be weighed or measured once and used as a reference point for the remainder of meal preparation that day. For example, rather than counting 20 croutons per meal or estimating 20 croutons per handful, work to find what measuring utensil fits 20 croutons and use that for service; two cups of lettuce may be measured and placed in a container for reference when hand-plating the remainder of the meals. This should occur daily as replicating portion sizes							2/4/2020 12:39:37 PM	

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from memory does not ensure accuracy. During onsite observation, no students were under-served as a result of staff using approximate measurements. All students, regardless of entree selection, had access to all meal pattern components in more than the minimum quantities required and no Technical Assistance or Corrective Action was warranted during onsite meal preparation observation to prevent the offering of non-reimbursable meals.							
01/28/2020	1432	805	Administrative Review	ALL	FSD		
Comments							
						Created By	Created Date
<ul style="list-style-type: none"> •SFAs may choose to accommodate special dietary requests without a signed medical statement. These accommodations must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is highly recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone. 							1/28/2020 8:37:50 AM
01/28/2020	1431	1006	Administrative Review	ALL	FSD		
Comments							
						Created By	Created Date
<p>LWP Triennial Assessment •SFAs are required to complete their first LWP triennial assessments by June 30, 2020 per 7 CFR 210.31(e)(2)).</p> <ul style="list-style-type: none"> •The assessment must measure the SFA's compliance with their LWP and contain description of the SFA's progress toward meeting policy goals. •A report must be released to the public. There is no mandatory template for this report. •DPI recommends using both the WellSAT Tool and the DPI LWP report card as resources to complete the LWP triennial assessment. 							1/28/2020 8:31:51 AM
01/28/2020	1430	709	Administrative Review	ALL	FSD		
Comments							
						Created By	Created Date
If not claiming and not charging for Alternate Meals, meal cost must be funded from a non-federal source and subject to nonprogram food regulation. If claiming but not charging, items must meet smart snacks and nonprogram food regulation.							1/28/2020 8:01:44 AM
01/27/2020	1429	706	Administrative Review	ALL	FSD		
Comments							
						Created By	Created Date
Per USDA memo SP27-2019, SFAs with a positive or \$0 balance in the food service account as of 12-31-18, were exempt from completing the PLE tool. It is unknown if this USDA flexibility will be available for 20-21. The PLE tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price). Refer to the DPI SNT Financial Webpage for additional guidance including PLE In a Nutshell and instructions for completing the PLE tool.							1/27/2020 4:08:31 PM
01/27/2020	1421	113	Administrative Review	ALL	FSD		

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Comments						Created By	Created Date
Disclosure means revealing or using individual children's Program eligibility information obtained through the eligibility process for a purpose other than the purpose for which the information was obtained. Disclosure includes but is not limited to access, release, or transfer of personal data about children by means of print, tape, microfilm, microfiche, electronic communication, or any other means. It includes eligibility information obtained through the application or through direct certification. The NSLA allows persons directly connected with the administration or enforcement of certain programs or activities to have access to children's eligibility information. For the ACT it would be permissible for those "who need to know" to receive the list of names and eligibility status without parental consent or completion of a waiver. It is encouraged for the person receiving the information to sign the disclosure agreement.							2/4/2020 7:11:45 PM
Anyone receiving eligibility information to approve students for non-food service program benefits, after parental consent is received, the Disclosure Agreement form should be signed and kept on file at the district. Find the Disclosure of Free and Reduced-Price Information template on the Free and Reduced Meal Applications and Eligibility webpage. ***ADD REST of TA when exported to Word.							1/27/2020 12:31:41 PM
01/15/2020	1322	305	Administrative Review	ALL	FSD		
Comments						Created By	Created Date
305I: Transferring the eligibility between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools is required.							1/15/2020 11:17:15 AM
01/15/2020	1321	305	Administrative Review	ALL	FSD		
Comments						Created By	Created Date
305e: SFAs may claim visiting students in the paid category or the individual's category with documentation (unless they are from a CEP school).							1/15/2020 11:11:07 AM
01/15/2020	1319	305	Administrative Review	ALL	FSD		
Comments						Created By	Created Date
OVS is required only for 9-12 students at lunch, but optional for K-8 at lunch and K-12 at breakfast. At breakfast, schools must offer at least 4 food items and students must select at least 3 food items, one of which is 1/2 cup fruit and/or vegetable. At lunch, schools must offer all 5 components and students must select at least 3 components, one of which is 1/2 cup fruit and/or vegetable. For specific quantities of what to offer each age/grade group, please refer to the meal pattern tables.							1/15/2020 10:50:30 AM
01/14/2020	1317	200	Administrative Review	ALL	FSD		

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Comments							Created By	Created Date
The Standard Sample Size for verification must be used by an LEA unless the LEA qualifies to use an alternate sample size. Instructions for standard and alternate sample sizes can be found in the Eligibility Manual. Whitnall did qualify for using an Alternate Sample due to a 0% nonresponse rate last year.								1/14/2020 2:53:41 PM
01/13/2020	1318	110	Administrative Review	ALL	FSD			
Comments							Created By	Created Date
When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015. Only when space is very limited, such as on the printed menus, the abbreviated statement may be used, "This institution is an equal opportunity provider." Both of these statements must be in the same font size as the main text in the document and the format of the statement cannot be altered.								1/14/2020 3:27:21 PM