

Administrative Review Report

Cashton School District

Commendations:

Due to the unprecedented COVID-19 related school closures beginning in March 2020, the State Agency (SA) was not able to perform the on-site portion of this Administrative Review (AR). The SA has, to the maximum extent feasible, continued to assist School Food Authorities (SFAs) with items that would normally be addressed in the on-site portion to ensure all SFAs are given the most thorough guidance and technical assistance possible. The SA appreciates the SFA's flexibility and willingness to complete the offsite review during this challenging time.

Commendations from the Nutrition Program Consultant: Thank you to all Cashton Child Nutrition Program staff for your patience and cooperation during this protracted AR. Cashton is doing a very good job running these programs. The district's Unpaid Meal Policy is excellent; It could be a model for other SFAs. All Free & Reduced applications were determined correctly. Counting and claiming has been validated; it is accurate and done according to regulations. Cashton has a clear understanding of how to serve their student population; they take students' civil rights seriously, and enact fair and considerate policies and procedures. There were no findings in the area of Financial Management, Verification, or Reporting & recordkeeping. Good work!

Public Health Nutritionist Commendations:

Thank you to the FSD at Cashton School District for being available when answering questions and providing additional information. We know that this review was unique due to COVID-19 but the FSD was very easy to communicate with. She was also very receptive to recommendations and guidance related to meal pattern compliance. It is clear that the FSD cares deeply about feeding the Cashton students delicious meals and providing them with the best customer service possible. I thoroughly enjoyed working with Cashton School District.

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Findings and Corrective Action:

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>Finding : All food substitutions made outside of the meal pattern are not supported by a signed medical statement from a licensed medical professional (7 CFR 210.10).</p> <p>CA1: Provide a detailed statement indicating the steps the district will take to ensure that food substitutions made outside of the meal pattern are made based on an appropriate medical statement and to retain copies of statements at the food service sites. CA2 : Take the Special Dietary Needs course offered at SNSDC 2020. Upload the certificate of completion into SNACS.</p>
Site Name	
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	141
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA is not in compliance with 7 CFR 245.6 which states a child's receipt of benefits from Direct Certification extends eligibility for free benefits to all children who are members of the same household with the exception of Foster child, homeless, migrant, runaway or Head Start and Even Start benefits. 2 students incorrectly received an extension of Foster benefits from another household member.</p> <p>CA 1.Notify the household(s) of students no longer eligible for free benefits as a result of the error in extension. Upload a copy of the adverse action letter into SNACS and provide documentation that the system has been updated with the new eligibility after the appeal period is complete.</p>
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>Finding: The correct and complete non-discrimination statement was not included on all required program materials including the public release, the school food service webpage, and all food service related materials going out to households.</p> <p>CA 1: Add the current USDA Nondiscrimination statement to required program materials in its original format. In cases where the complete statement cannot fit on the program materials, include only this shortened version: "This institution is an equal opportunity provider." CA 2: Submit a statement of understanding that the complete USDA non-discrimination statement must accompany all child nutrition program related materials.</p>
Site Name	
Form Name	Professional Standards (1210 - 1219)
Question #	1217
TA Log #	No TA Log# found
Due Date	

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Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p>CA: Include all training hours completed in the 19/20 school year for each school food service employee onto the USDA or DPI professional standards training tracking tool, or an SFA-designed tracking sheet, and upload into SNACS. Ensure each tool includes the trainee's name, date of hire, position/role, training hours completed, dates of training, who provided the training and the subject of the training.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding 1: Non-nutrition staff who have responsibilities for the school nutrition program(s), including those working at the POS, as custodial help in the cafeteria and those working with counting and claiming, did not receive job specific training in the current school year (7 CFR 210.30). Finding 2: Non-nutrition staff did not receive annual Civil Rights training.</p> <p>CA: Provide a training plan for the next school year, for all non-school nutrition staff, with school nutrition program responsibilities.</p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA's food safety plan at each school did not include all the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP) (7 CFR 210.13). Employee Illness Reporting agreements should be signed, dated and kept on file for each current employee.</p> <p>CA: Update the food safety plan to include the employee reporting agreements for the next school year.</p>
Site Name	Cashton Hi	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History		<p>Finding: The weekly minimum requirement for legumes was not met for 9/12 for lunch during the review period. The following represent the planned portion sizes: -Tuesday: refried beans- 1/4 cup The weekly minimum requirement for legumes for 9-12 is 1/2 cup.</p> <p>Corrective Action: Describe specifically how the weekly minimum requirement for legumes will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	Cashton Hi	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	

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TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History		<p>Finding : The daily minimum requirement for Fruit was not met for 9-12 for lunch during the review period. The following represent the planned portion sizes: - Monday: 3/4 cup fruit total -Tuesday: 3/4 cup fruit total -Wednesday: 1/2 cup fruit total -Friday: 1/2 cup fruit total The daily minimum requirement for 9-12 is 1 cup fruit. Corrective Action: Describe specifically how the daily minimum requirement for fruit will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	Cashton Hi	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History		<p>Finding: There was a weekly grain shortage at lunch during the week of review. Only 8.25 oz eq grain was offered over the course of the week, which does not meet the minimum 10 oz. eq. grain requirement for the 9-12 meal pattern. Corrective Action: Submit a statement explaining how this weekly grain shortage will be fixed during the week of review. If this shortage will be fixed by the implementation of other Corrective Action responses, please note that in your statement.</p>
Site Name	Cashton Hi	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	412	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History		<p>Finding : The daily minimum requirement for grains was not met for 9-12 for lunch during the review period. The following represent the planned portion sizes: - Tuesday: Fritos: 1.25 oz. eq. grain -Friday: chicken nuggets: 1 oz. eq. grain The daily minimum requirement for 9-12 is 2 oz. eq. grain. Corrective Action : Describe specifically how the daily minimum requirement for grains will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	Cashton Hi	
Form Name	SFA On-Site Monitoring (901 - 904)	
Question #	901	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Finding: SFA did not meet on-site monitoring requirements per 7 CFR 210.8 by February 1 of each school year. CA: Provide a statement of understanding that on-site monitoring is required to be completed prior to February 1 and include the position responsible for completing this documentation to keep on file at the SFA.	
Site Name	Cashton Hi	
Form Name	Afterschool Snack Program	
Question #	7	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Finding: The Afterschool Snack onsite monitoring was not completed within the required timeframes. (7 CFR 210.9) CA: 1. Provide a statement of understanding that the Afterschool Snack Program must be monitored twice each year at each site it is operated at. Once during the first four weeks of the program plus one additional time during the program year.	

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
08/06/2020	2202		Administrative Review					
Comments								
						Created By	Created Date	
Ongoing Training: A few of Cashton's AR findings are a result of an unawareness of program regulations that have been requirements for several years. There are two primary ways in which SFAs can stay informed and in compliance as regulations change over time: 1) Receive and read School Nutrition Team bi-weekly emailed bulletins. 2)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 are free, 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 webpage (dpi.wi.gov/school-nutrition/training). For 2020 all SNSDC course are video recordings available to watch 24 hours, and up until 9/4/20.							8/6/2020 8:53:08 AM	
08/06/2020	2201		Administrative Review					
Comments								
						Created By	Created Date	
Verification compliance reminders: School Food Authorities (SFAs) must annually verify student eligibility from a sample of household applications approved for free and reduced price meals from the current school year. In order to accurately track the verification process and ensure program requirements are met, SNT recommends use of the verification tracker: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form.docx .							8/6/2020 8:39:05 AM	
Verification compliance reminders: • When applications are 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. • The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual. • 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.							8/6/2020 8:34:17 AM	
08/06/2020	2200		Administrative Review					
Comments								
						Created By	Created Date	
SFA is required to complete an assessment of the LWP (1005) Technical Assistance: The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the							8/6/2020 8:29:05 AM	

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SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at School Nutrition Team's Wellness Policy webpage (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the USDA Wellness Policy webpage (http://www.fns.usda.gov/tn/implementation-tools-and-resources). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the Wisconsin Health Atlas webpage (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool (WellSAT) for assistance in assessing the LWP (http://wellsat.org/).									
06/29/2020	2137	1403	Administrative Review	ALL	FSD				
Comments					Created By	Created Date			
Food products used for the school meals program must have documentation if they are non-domestic. Further information can be found in Buy American in a Nutshell (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf). Please complete non-domestic documentation for any products at the school and the off-site kitchen (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).						6/29/2020 3:03:50 PM			
06/29/2020	2136		Administrative Review		FSD				
Comments					Created By	Created Date			
The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal.						6/29/2020 2:55:25 PM			