

Administrative Review Report

Norwalk-Ontario-Wilton School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/28/2022	02/21/2023
On-Site Review	02/21/2023	02/23/2023
Site Selection Worksheet	12/28/2022	12/28/2022
Entrance Conference	12/21/2022	02/21/2023
Exit Conference	02/23/2023	02/23/2023

Commendations:

We appreciate your availability for conversations while State Agency staff were onsite. School staff were very welcoming and willing to answer questions.

Thank you for working on the offsite questionnaire and uploading documents to SNACS in advance.

The determining official does a great job managing meal benefits. Out of the 191 eligibility statuses reviewed, there were no errors found. The official keeps very detailed notes regarding benefits and does a very thorough job handling benefit extensions.

Recommendations:

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Findings and Corrective Action:

Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	108	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/21/2023 10:29 AM	Finding: The hearing official listed in the approved 2022-23 online school nutrition contract is not correct. Corrective Action: Update the hearing official contact information in the 23-24 online school nutrition contract.
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/24/2023 08:01 AM	Finding: The SFA has received Supply Chain Assistance (SCA) Funds and not in compliance with the Attestation signed when receiving these funds. The SFA is not aware of what the funds can be spent on, and the funds are not being tracked separately. CA: 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. It is recommended the SFA utilize SCA Funds Expense Tracker .
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/24/2023 08:07 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	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 04/07/2023 09:49 AM	Finding: SFA is not tracking nonprogram foods revenue and expenditures. CA: Provide a plan on how nonprogram food revenue and expenditures will be tracked.
Site Name		

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Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/22/2023 08:27 AM	Findings: 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 civil rights 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. It is recommended the SFA adapt the Template Civil Rights Complaint Procedures for SFAs .
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/21/2023 12:56 PM	Finding: Civil Rights training did not occur for all staff who interact with program participants in the current school year (FNS Instruction 113-1). CA: Provide the civil rights training to all staff that interact with program applicants found on the DPI website. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	807	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/22/2023 08:30 AM	Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31. CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/22/2023 08:35 AM	Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years. CA: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	128	

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TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/21/2023 10:18 AM	Finding: The correct income conversation factors were not used when determining meal eligibility on free and reduced price meal applications. Applications with one income frequency were annualized. CA: Review the Income Conversions section of the Eligibility Manual (pg 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced price meal application.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/21/2023 12:51 PM	Finding: The non-discrimination statement was not included on the local wellness policy and unpaid meal charge policy. CA: Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS.
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1216	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/24/2023 08:47 AM	Finding: The school nutrition program staff did not complete the required training hours for the current school year and was unable to provide a training plan for the current school year (7 CFR 210.30). CA: Review the School Nutrition Team Professional Standards webpage for annual training requirements for school food service staff. Provide a training plan for how each staff member that is not in compliance will meet the required training hours for the current school year.
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/22/2023 08:49 AM	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. CA: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.
Site Name	Norwalk-Ontario-Wilton EI	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/22/2023 10:46 AM	Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). The point of service (POS) did not provide a reliable or accurate meal count due to teachers scanning student IDs prior to them going through the line. Teachers are also not trained on OVS and what constitutes a reimbursable meal. CA: Correct the POS to ensure accurate counts are tracked. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.
Site Name	Norwalk-Ontario-Wilton EI	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	325	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/22/2023 10:10 AM	Finding 1: SFA is using highest number of meals served to free and reduced students instead of highest number of approved free and reduced students on file. Finding 2: SFA is using the end of the month enrollment number instead of the highest enrollment number for the month based on the edit check. Corrective Action: Submit the month of onsite (February) edit check prior to entering the claim online.
Site Name	Norwalk-Ontario-Wilton EI	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	409	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/18/2023 05:39 PM	Missing Crediting documents. Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.
Site Name	Norwalk-Ontario-Wilton EI	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/18/2023 05:37 PM	Finding: Production Records currently being used are missing a few requirements. Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). Serving size - "1 each" is not a serving size. List actual serving size listed on packaging or recipe. Planned/actual quantity prepared in purchase units One of the milk types was crossed off and "Water" was written in. Water is to be available to students, but is not a component of the meal pattern and does not need

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		to be provided in the milk cooler in individual serving bottles.
		Corrective Action: Submit one full week of completed production records, include all required information, recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.
	CAP Removed 04/18/2023 05:38 PM	CAP Removed
	Flagged 04/18/2023 06:23 PM	<p>Finding : Shortages at breakfast and lunch Daily Grain Shortage at breakfast:</p> <p>On Tuesday 01.24.23, no grains were offered. On Friday 01.27.23 , the 2 oz combo bar offered on the breakfast menu credited as 1.25 oz eq, 1 oz eq m/ma + 0.25 oz eq wg. K-8 students are required to be offered 1 oz eq wg daily at breakfast. Daily Fruit Shortage at breakfast:</p> <p>Monday 01.23.23, short ½ cup fruit Weekly Shortage at lunch :</p> <p>Beans/Peas/Legumes, short ? cup.</p> <p>Corrective Action : Submit a statement explaining what will be done to the breakfast and lunch menus on the week of review so that there is no daily shortages.</p>
Site Name	Norwalk-Ontario-Wilton EI	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/18/2023 05:40 PM</p>	<p>Finding: Production Records currently being used are missing a few requirements. Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p>Serving size - "1 each" is not a serving size. List actual serving size listed on packaging or recipe. Planned/actual quantity prepared in purchase units One of the milk types was crossed off and "Water" was written in. Water is to be available to students, but is not a component of the meal pattern and does not need to be provided in the milk cooler in individual serving bottles.</p> <p>Corrective Action: Submit one full week of completed production records, include all required information, recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Site Name	Norwalk-Ontario-Wilton EI	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	434	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 04/18/2023 05:41 PM	<p>Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. The standardized recipe for the Spaghetti (pasta) and Spaghetti with meat sauce needs to be updated with the current operations and products.</p> <p>Corrective Action : Submit a standardized recipe for the Spaghetti (pasta) and Sauce with Meat. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p>
Site Name	Norwalk-Ontario-Wilton El	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/18/2023 05:42 PM	<p>Finding: Although no non-reimbursable meals were observed during the days of onsite review, many students were made to take more than what they needed at lunch. The lunch Offer versus Serve (OVS) requirements are not fully understood by all the teaching staff at the point of service. OVS resources on WI DPI's Menu Planning webpage may be used as training resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning). The Meal Pattern e-learning resources may also be helpful (https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns:~:text=Policy-,Meal%20Patterns,-Title%20/%20Description)</p> <p>Corrective Action : Have all school staff working at the point of service, observing if reimbursable meals are being served attend a training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Site Name	Norwalk-Ontario-Wilton El	
Form Name	Offer vs Serve (500-502)	
Question #	502	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/18/2023 05:43 PM	<p>Finding: Signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p>Corrective Action: Submit a picture of completed signage posted near the lunch and breakfast service line.</p>
Site Name	Norwalk-Ontario-Wilton El	
Form Name	Civil Rights (811-812)	
Question #	811	
TA Log #	No TA Log# found	

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Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 02/21/2023 12:54 PM	Finding: An outdated version of the nondiscrimination "And Justice for All" poster is being used. (FNS Instruction 113). CA: Print the 2019 "And Justice for All" poster in 11" by 17" format and upload a picture into SNACS.	
Site Name	Norwalk-Ontario-Wilton El		
Form Name	SFA On-Site Monitoring (901 - 904)		
Question #	901		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 02/22/2023 09:48 AM	Finding: SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8. CA 1: Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA. CA 2: Submit a plan on how onsite monitoring will be completed for each school and program moving forward and the position responsible.	
Site Name	Norwalk-Ontario-Wilton El		
Form Name	Food Safety, Storage and Buy American (1404-1411)		
Question #	1406		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 02/21/2023 12:44 PM	Finding: The most recent food safety inspection report was not posted in a publicly visible location. CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.	
Site Name	Norwalk-Ontario-Wilton El		
Form Name	Food Safety, Storage and Buy American (1404-1411)		
Question #	1411		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 04/18/2023 06:27 PM	Finding: Food products were identified in the SFA's storage area as non-domestic/not containing a Country of Origin and the FSD does not maintain a list of Buy American Noncompliant Products or SFA equivalent. Buy American Provision Wisconsin Department of Public Instruction . Corrective Action : Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. If no country of origin is identified on the label, then the SFA must get documentation/ certification from the distributor or supplier. Provide a copy of the form(s) that will be used and include any noncompliant products.	

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
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04/07/2023	3398		Administrative Review		FSD				
Comments					Created By	Created Date			
The SFA should complete the Wisconsin Adult Meal Pricing worksheet annually to ensure the adult meal price is sufficient.						4/7/2023 9:52:00 AM			
04/07/2023	3476		Administrative Review		FSD				
Comments					Created By	Created Date			
04/07/2023	3475		Administrative Review		FSD				
Comments					Created By	Created Date			
02/23/2023	2985		Administrative Review		FSD				
Comments					Created By	Created Date			
SFAs are required to ensure that all revenue from the sale of non-program foods accrues to the non-profit school food service account (7 CFR 210.14(f)). Non-program foods include any non-reimbursable foods and beverages (adult meals, a la carte, vending, catering, etc.) purchased using funds from the non-profit school food service account. 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 Non-program Food Revenue Tool or the USDA Non-program 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 Non-program Foods Revenue Rule SP-20-2016. Revenue available to support the production of reimbursable meals cannot subsidize the sale of non-program foods. Use the USDA Nonprogram Food Revenue Tool (https://dpi.wi.gov/sites/default/files/imce/schoolnutrition/xls/usda-nonprogram-food-revenue-tool.xlsx) annually, at a minimum, to determine if the proportion of nonprogram food revenue to total food service revenue is equal to or greater than the proportion of nonprogram food cost to total reimbursable meal food costs + nonprogram food cost. Regarding catering costs, it is recommended to regularly assess the charges for catering services provide. Like with all other non-program foods, the charges for catering must fully cover the costs associated with providing the service which includes food, labor, supplies, etc.						2/23/2023 1:08:14 PM			
02/23/2023	2984		Administrative Review		FSD				
Comments					Created By	Created Date			
When counting and claiming field trip meals ensure that student accounts are not charged based on 'orders' for field trip meals. Send a student roster along with preordered meals, have adult staff person check off each student's name as they receive their meal (POS) and return the roster to food service. At that point student accounts may be charged.						2/23/2023 1:05:49 PM			
02/23/2023	2983		Administrative Review		FSD				
Comments					Created By	Created Date			
It is important that an Angel Fund is distributed equitably among the students to protect your SFA from civil rights complaints. It is recommended to establish internal procedures for how to the Angel Funds in an equitable manner.						2/23/2023 1:04:58 PM			
02/23/2023	2982		Administrative Review		FSD				
Comments					Created By	Created Date			
Excellent job promoting the SBP in the beginning of the school year. Best practice is to promote the SBP throughout the school year. For example, promote the SBP at the						2/23/2023 1:03:28 PM			

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beginning of the second semester or quarterly. Consider strategies available on the SNT Marketing Your Program Webpage.							
02/23/2023	2981		Administrative Review		FSD		
Comments							
					Created By	Created Date	
The DPI School Nutrition Team will host two live summer training courses and one virtual option. It is recommended that the FSD attends one of these training opportunities and bring staff as applicable. Additionally, the Wisconsin School Nutrition Association (WI-SNA) hosts a summer and fall conference annually. Fund 50 can be used to pay for foodservice staff to attend training opportunities and conferences.							2/23/2023 1:00:10 PM
02/23/2023	2980		Administrative Review		FSD		
Comments							
					Created By	Created Date	
Foodservice staff should be responsible for taking point of service (POS) meal counts at lunch instead of teachers. Removing the second service line and purchasing extra trays can free up a food service employee to manage the POS. A keypad can be used for student to enter their pin at the register instead of teachers keeping student IDs. As a backup system for students forgetting their pins, a binder organized by classroom can be kept at the register with student names and barcodes to scan.							2/23/2023 12:59:18 PM