

Administrative Review Report

Gillett School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/15/2024	04/12/2024
On-Site Review	04/09/2024	04/10/2024
Site Selection Worksheet	02/15/2024	02/15/2024
Entrance Conference	04/09/2024	04/10/2024
Exit Conference	04/10/2024	04/10/2024

Commendations:

From Public Health Nutritionist:

Thank you to all staff at Gillett School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. The Food Service Director was very receptive to the reviewer's suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your students!

From the Nutrition Program Consultant:

My sincere thanks to the staff at Gillett School District for your warm welcome. I appreciate the time and efforts spent preparing for and participating in the administrative review. I appreciate the food service director's knowledge and passion for feeding students healthy meals and exploring ideas to increase participation.

I was impressed with how well all staff work as a team and how well they interact with students. The kitchen we visited was clean and organized. They very obviously take a lot of pride in their work! I appreciate everyone's willingness to be receptive to feedback and technical assistance.

Awesome job and thank you for what you do for kids!

Recommendations:

- Registration for the DPI School Nutrition Summer Training is coming soon! Our *Opening Ceremonies* kick off this year's conference the afternoon of Monday, July 15, with classes running through Wednesday, July 17. Stay tuned for the conference schedule and registration, coming in early May. Get ready to champion excellence in school nutrition!
- If you can't attend our summer training in person, no problem! We will offer select courses virtually August 6th, 8th, 13th, and 15th, for added flexibility.
- See the [DPI School Nutrition Webpage](#) for up-to-date guidance, training opportunities, and information related to this report.

Administrative Review Report

Gillett School District

Findings and Corrective Action:

Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/14/2024 02:53 PM</p>	<p>Finding: The SFA does have a written unpaid meal charge policy and has distributed a version of it to all households in writing. However:</p> <ol style="list-style-type: none"> 1. The policy does not reflect what is actually taking place at the point of service. 2. The policy refers to a "permissible negative balance amount" but then does not specify what the amount is nor what will happen if an account reaches this amount. 3. Two different versions of the policy currently exist; school board policy 8500 and on the food service page. <p>See the Unpaid Meal Charges Policy section of the DPI School Nutrition Team website for information on policy requirements.</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> 1. Update the Unpaid Meal Charge Policy to reflect specific and accurate information of how negative meal accounts are handled, specifically, whether children will be fed and the consequences of having a negative balance on the meal account. If specific dollar amounts apply, include these dollar amounts. "Permissible negative balance amount" is not sufficient. Please note: this policy must also include the current non-discrimination statement. <p>Provide a timeline of when the Unpaid Meal Charge Policy will be updated.</p> <ol style="list-style-type: none"> 2. If the policy is to be posted in areas other than school board policies (e.g., handbook, food service webpage), ensure they match the school board policy. <p>Provide a statement that all posted Unpaid Meal Charge Policies will be the same.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
TA Log #	No TA Log# found	

Administrative Review Report

Gillett School District

Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 05/16/2024 10:47 AM</p> <p>Finding: The 2022-23 WiSFiP report was not provided to validate the 2022-23 Annual Financial Report. On the Annual Financial Report (AFR), revenues and expenditures must match the WiSFiP auditor's report to ensure that all food service revenues and expenditures are accurately reported. If they do not match, the AFR must be corrected and resubmitted prior to December 31.</p> <p>Corrective Action: Determine if there is a discrepancy between the auditor's report and the AFR. If there is, complete an AFR correction template which is found on the financial management section of the school nutrition website.</p> <p>Upload the AFR correction template into SNACS. Since it is past the December 31 deadline, the NPC will forward this to the DPI accountant to make the adjustments in the system.</p>
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	<p>Flagged 05/14/2024 06:02 PM</p> <p>Finding: The SFA is selling food and supplies (non-program foods) to other school organizations at the invoice price. Non-program foods are any foods sold that are not part of a reimbursable meal. USDA child nutrition program regulations require non-program foods are priced so that all costs associated with the non-program foods are covered, including labor, supplies, and purchased services. This is to ensure that reimbursements are not subsidizing non program foods and are used solely for the benefit of feeding children school meals.</p> <p>Corrective Action: Provide a statement that the price for catering and other non-program foods and supplies will be marked up enough to cover all costs associated with each item beginning no later than July 1, 2024.</p>
Site Name	
Form Name	Civil Rights (800 - 807)
Question #	801
TA Log #	No TA Log# found
Due Date	

Administrative Review Report

Gillett School District

Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/14/2024 02:58 PM</p>	<p>Finding: The Public Release was distributed to the local media, but not to grassroots organizations which are local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.)(7 CFR 245.5(a)(2)).</p> <p>Corrective Action: Upload into SNACS the names of 2-3 grassroots organizations that the public release will be sent in the 2024-25 school year and moving forward.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/14/2024 06:10 PM</p>	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Utilizing the DPI template policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA and upload into SNACS. CORRECTED ONSITE. NO FURTHER ACTION NEEDED.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	805	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/14/2024 07:32 PM</p>	<p>Finding: Two areas of the Dietary Modifications Policy (school board policy 8500) need to be changed:</p> <ol style="list-style-type: none"> 1. In situations where a medical statement or IEP is not immediately available, is incomplete, or requires additional clarification, USDA regulations require that the meal modification still be made if there is enough information to provide a safe meal. The USDA does not specify how long to wait or how many attempts are needed to receive documentation before discontinuing a meal modification. However, reasonable attempts should be made to get the correct documentation.

Administrative Review Report

Gillett School District

		<p>2. SFA should not ask for a student's medical condition, but only how the condition or symptom affects the student's diet.</p> <p>Corrective Action:</p> <p>1. Remove the language from the Dietary Modifications policy that indicates documentation must be submitted "within thirty (30) school days...or the dietary modification may be discontinued until such a statement is received".</p> <p>2. Change the <i>items the certification must identify</i> to:</p> <p>A. an explanation of how the child's physical or mental impairment restricts the child's diet</p> <p>B. the food(s) to be avoided</p> <p>C. the food(s) to be substituted</p> <p>Provide a timeline for when the Dietary Modifications policy will be changed and the name of the person responsible for ensuring the update is made.</p>
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	<p>Flagged</p> <p>05/14/2024 06:08 PM</p>	<p>Finding: USDA Civil Rights training did not occur for all staff with duties related to the school nutrition program (FNS or Instruction 113-1), specifically the determining official and the authorized representative.</p> <p>Corrective Action: Provide a statement that USDA civil rights training will be completed by all staff with duties related to the school nutrition program. Since this includes multiple school district staff members, it may be beneficial to include the USDA Civil Rights training in yearly training requirements for all school district staff.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

Administrative Review Report

Gillett School District

<p>Corrective Action History</p>	<p>Flagged 05/15/2024 09:34 AM</p>	<p>Finding: The current Local Wellness Policy (LWP) is missing 9 of 13 required content areas (7 CFR 210.31). The LWP must be revised by a wellness committee comprised of a diverse group of stakeholders. The public must be invited to participate in the development and revising of the LWP. The wellness committee should use the Local Wellness Policy checklist, The Local Wellness Policy in a Nutshell, and work with Neola to create a new policy.</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> 1. Upload in SNACS a list of wellness committee members that will be part of the LWP update. 2. Provide a timeline for when a new LWP will be made and shared with the public. Also provide the name of the person responsible for ensuring the update is made.
<p>Site Name</p>		
<p>Form Name</p>	<p>Certification and Benefit Issuance (124 - 142)</p>	
<p>Question #</p>	<p>126</p>	
<p>TA Log #</p>	<p>TA Log# exists</p>	
<p>Due Date</p>		
<p>Corrective Action Status</p>	<p>CAP Submitted</p>	
<p>Corrective Action History</p>	<p>Flagged 05/14/2024 07:16 PM</p>	<p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form, uploaded in SNACS, for specific details on which applications need to be corrected.</p> <p>There were 209 benefits reviewed with 7 reviewed student errors and 2 non reviewed student errors.</p> <ul style="list-style-type: none"> • One student is reduced on DC but is in a household with a student who is free. The free benefit should have been extended. • Two students on were approved free on an incomplete application. This should have been denied until the application was completed in full. • Four students were categorically approved using Badgercare which is an ineligible program. Of these, three students qualified for reduced-price meals by income and one student did not qualify by income. <p>Corrective Action:</p> <ol style="list-style-type: none"> 1. Utilizing the SFA-1 form, correct the error(s) by sending the families letters with the new benefit information. On the SFA-1 form, indicate the date(s) the correction was made. Upload a copy of the updated SFA-1, including all corrective action dates listed next to each error, into SNACS.

Administrative Review Report

Gillett School District

		2. Provide a statement that the determining and verifying official will attend DPI School Nutrition Summer Training classes, Free & Reduced Basics and Special Situations in Free & Reduced, either in person, virtually or both.
	CAP Submitted Alexandra Klemens 05/15/2024 12:19 PM	1. Corrections have been made dated 10 days for change of benefits - letters have been mailed out to our families. I have uploaded the SFA-1 form. 2. I, Ali Klemens will be attending the DPI School Nutrition Summer Training - I will attend the Free & Reduced Basics and Special Situations in Free & Reduced classes in person, along with any other classes that fit for me.
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/14/2024 02:11 PM	<p>Finding: SFA did not complete a confirmation review before verifying application(s).</p> <p>Corrective Action: The confirming official should review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	214	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 05/14/2024 02:15 PM	<p>Finding: The SFA did not provide the household with ten calendar days' notice, from the date of notification, when benefits were reduced as a result of verification (7CFR 245.6a).</p> <p>Corrective Action: Submit a statement of understanding that ten calendar days must be provided to households prior to reducing benefits, as a result of verification.</p>
	CAP Submitted Alexandra Klemens 05/15/2024 09:46 AM	I understand that 10 calendar days must be provided to households prior to reducing benefits, as a result of verification. - Ali Klemens
Site Name	Gillett Elementary	

Administrative Review Report

Gillett School District

Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/15/2024 08:52 AM</p>	<p>Finding: There was no signage posted on or near the salad bar to indicate portion sizes and tongs were used as the intended serving utensils. When using the vegetables on the salad bar to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage.</p> <p>Salad Bar Signage Template can be found on our Signage webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).</p> <p>Corrective Action: Submit a picture of completed salad bar signage posted near or on the serving line.</p>
Site Name	Gillett Elementary	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/15/2024 08:53 AM</p>	<p>Finding: During onsite visit the preschool students were served the K-5 breakfast and lunch meal pattern but were not served at the same time and in the same place as the older students; 3K and 4K students had their own breakfast and lunch periods. Children who are not yet in kindergarten must be served the preschool meal pattern if not co-mingled with other grade groups at meals. Refer to the Preschool Meal Pattern in a Nutshell document for more information on feeding preschool students.</p> <p>Corrective action: Submit a statement describing the specific changes made to meal service in order to serve the preschool students the age-appropriate meal pattern.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
05/14/2024	5032		Administrative Review		FSD			
Comments					Created By		Created Date	

Administrative Review Report

Gillett School District

The manual sheets, where the teachers mark off names, is the point of service document, since that is where it is determined the child received a reimbursable meal. Even though the counts are entered into the electronic system, the manual sheets should be kept for three years, plus the current year.

05/14/2024	5031		Administrative Review		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 and grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.). SFAs are allowed to, but not required to pay to have the public release published. If a publishing fee is required, maintain documentation of whom it was sent to along with the amount to publish.								
						5/14/2024 7:28:35 PM		
05/14/2024	5030	126	Administrative Review	ALL	DO			
Comments								
						Created By	Created Date	
All paper applications must be completed on the back with the income information, determination, and determining official signature.								
						5/14/2024 7:24:59 PM		
05/14/2024	5029	126	Administrative Review	ALL	DO			
Comments								
						Created By	Created Date	
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 clarify information verbally or through email. However, applications missing signatures must be returned to the household to obtain. The determining official should document the details of the conversation. Reasonable effort should be made to obtain the missing information prior to denying the application.								
						5/14/2024 7:21:50 PM		
05/14/2024	5028		Administrative Review		FSD			
Comments								
						Created By	Created Date	
The SFA completed the Nonprogram Foods Revenue Tool, which showed some non-program foods are not priced sufficiently to cover all costs, including food, labor, equipment, and purchased services. Evaluate the selling price all non-program foods and raise prices for the 24-25 school year.								
						5/14/2024 6:17:43 PM		
05/14/2024	5027	805	Administrative Review	ALL	FSD			

Administrative Review Report

Gillett School District

Comments							
				Created By	Created Date		
<p>It is recommended to use a common form for meal accommodation requests that are made outside the USDA meal pattern whenever possible. Posting a medical form on the school district website where families can easily access it will help encourage the use of a common form. The form must include an explanation of how the child's physical or mental impairment restricts the child's diet B. the food(s) to be avoided C. the food(s) to be substituted. The DPI medical statement is not required but is recommended as it includes information of requirements and is simple and clear. The form is also fillable; therefore, can be completed electronically.</p>							
5/14/2024 6:10:14 PM							
05/14/2024	5026	430	Administrative Review	Gillett Elementary	FSD		
Comments							
				Created By	Created Date		
<p>Production records are intended to be useful tools to record production information. The production record template currently in use lacks required information: planned/actual quantity prepared in bulk units and number of meals planned. A copy of the Production Record Requirements and templates may be found on our webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records)</p>							
5/14/2024 1:26:20 PM							
05/14/2024	5024	431	Administrative Review	Gillett Elementary	FSD		
Comments							
				Created By	Created Date		
<p>Be specific on production records about the identity, brand, portion size, and description of items served. Instead of "juice", list each flavor of juice separately to clearly indicate what was served. This also applies to "cereal variety." Be sure to list each type of cereal individually.</p>							
5/14/2024 1:18:06 PM							
05/14/2024	5023	437	Administrative Review	Gillett Elementary	FSD		
Comments							
				Created By	Created Date		
<p>In-house yield may be used to credit vegetables towards meal pattern requirements. Original documentation of procedures used to determine yield must be completed and maintained. An in-house yield study may be warranted if yields are consistently higher or lower than specified in the USDA Food Buying Guide (FBG), or for foods or sizes not currently listed. In-House Yield Study Procedures are available on the Menu Planning webpage, under the Crediting tab. (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ihy).</p>							
5/14/2024 1:16:55 PM							
05/14/2024	5022	431	Administrative Review	Gillett Elementary	FSD		
Comments							
				Created By	Created Date		
<p>During the week of review a few menu items listed on the production record were credited incorrectly toward the meal pattern: -Taco meat: the production record indicated a serving size of 3.17 oz = 2 oz eq meat/meat alternate, but the</p>							

Administrative Review Report

Gillett School District

USDA product information sheet indicates that 1.72 oz of taco meat by weight = 1 oz eq meat/meat alternate. Therefore, 3.44 oz of taco meat (by weight) must be offered to contribute 2 oz eq. meat/meat alternate toward the meal pattern. -Macaroni and cheese: the production record indicated a 4 oz serving size and credited it as 1 oz eq grain. The CN label provided for this product indicated that a 6 oz serving (by weight) contributes 2 oz eq meat/meat alternate and 1 oz eq grains. Therefore, a 4 oz serving would contribute 1.25 oz eq meat/meat alternate and 0.5 grain toward the meal pattern.

5/14/2024 1:09:35 PM

05/14/2024	5021	411	Administrative Review	Gillett Elementary	FSD			
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Comments

Created By

Created Date

The USDA Menu Planning Worksheets are helpful tools to ensure meal pattern requirements are met at both breakfast and lunch. These can be found on USDA's website: <https://www.fns.usda.gov/cn/certification-compliance-worksheets-5-day-schedule>

5/14/2024 1:08:16 PM

05/14/2024	5020	433	Administrative Review	Gillett Elementary	FSD			
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Comments

Created By

Created Date

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. Maintain and organize this information in a manner that is easy to reference and update, such as a binder, file folders divided into categories, or organized as digital files. These records should be reviewed and updated at least twice per year and as new products are purchased.

5/14/2024 1:07:28 PM

05/14/2024	5019	435	Administrative Review	Gillett Elementary	FSD			
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Comments

Created By

Created Date

Use of standardized recipes is another important part of USDA School Meals Programs. Any menu item that has more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Continue to use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the Standardized Recipes webpage (<https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>). We encourage viewing the webcast, What's the Yield with Standardized Recipes?, which guides the viewer through the recipe standardization process (https://media.dpi.wi.gov/school-nutrition/whats-yield-with-standardized-recipes/story_html5.html)

5/14/2024 1:06:50 PM

05/14/2024	5017	411	Administrative Review	Gillett Elementary	FSD			
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Administrative Review Report

Gillett School District

Comments							
				Created By		Created Date	
<p>Using a cycle menu may ease the burden of menu planning and help ensure meal pattern requirements are met after a compliant cycle has been planned. For more information and recipes, visit the Cycle Menu webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/cycle-menu).</p>							
5/14/2024 1:06:10 PM							
05/14/2024	5015	1106	Administrative Review	Gillett Elementary	FSD		
Comments							
				Created By		Created Date	
<p>If an organization is selling foods or beverages that meet the Smart Snacks standards: -These foods or beverages may be sold at any time and in any location. -The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator. If an organization is selling foods or beverages that do not meet the Smart Snacks standards: -These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length. -Exempt fundraisers cannot occur in the meal service area during mealtimes. -Someone in the school must keep track of the exempt fundraisers.</p>							
5/14/2024 12:46:20 PM							