

Administrative Review Report

Hortonville School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/25/2019	03/22/2019
On-Site Review	04/09/2019	04/11/2019
Site Selection Worksheet	01/25/2019	01/25/2019
Entrance Conference	04/09/2019	04/09/2019
Exit Conference	04/11/2019	04/11/2019

Commendations:

Thank you to the staff at Hortonville 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 questions, use and upload data to SNACS and for pulling records for the on-site portion of the review.

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

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Findings and Corrective Action:

Form Name	Certification and Benefit Issuance (100 - 121)
Question #	106/109
Corrective Action	<p>Finding: IT personnel have access to Direct Certification data without disclosure form on file.</p> <p>CA: Complete disclosure form for all personnel, who work outside of the school nutrition program, with access to sensitive data and submit to reviewer. Corrected on-site; no further action needed.</p>
Form Name	Certification and Benefit Issuance (100 - 121)
Question #	126
Corrective Action	<p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). One application was not determined correctly due to missing/incorrect household information. Two applications miscategorized. See the SFA-1 form provided by the consultant for details.</p> <p>CA: Contact household(s) with incomplete application(s) and request the missing information. Send adverse action letters to two households incorrectly determined. Corrected on-site, no further action needed.</p>
Form Name	Certification and Benefit Issuance (100 - 121)
Question #	135
Corrective Action	<p>Finding: The SFA did not retain DC match runs on file at the SFA, either electronically or hard copy (7 CFR 245.6).</p> <p>CA: Provide a statement describing how the SFA will retain DC files for the required timeframe.</p>
Form Name	Resource Management
Question #	Revenue from Nonprogram Foods
Corrective Action	<p>Finding: Revenue from nonprogram milks in WSDMP (paid students participating) is coded to WSDMP and not nonprogram foods.</p> <p>CA: Please correct the AFR, to indicate the correct nonprogram food costs and revenue for nonprogram milks in the WSDMP. Upload manual corrections to SNACS as corrective action.</p>
Form Name	Civil Rights (800 - 807)
Question #	800

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<p>Corrective Action Status</p>	<p>Finding #1: Format of nondiscrimination statement on household letters not correct-must be same font/font size as body of document and same format as back of application. CA #1: Correct format of NDS on all HH letters. Corrected on-site, no further action needed.</p> <p>Finding #2: Fee waiver form in use by district does not contain full nondiscrimination statement. CA #2: Correct Fee waiver form to include full NDS, in correct font/font size and format as back of application.</p>
<p>Form Name</p>	<p>Civil Rights (800 - 807)</p>
<p>Question #</p>	<p>801</p>
<p>Corrective Action Status</p>	<p>Finding: The Public Release was not distributed to the required locations.</p> <p>CA: Upload into SNACS the names of the 3 organizations that the Public Release will be sent to in the following year. Corrected on-site; no further action needed. Statement provided:</p> <p>We will send the Public Release to the following for the 2019-2020 school year Appleton Post Crescent Hortonville Public Library Gilberts Sentry Grocery Store</p>
<p>Form Name</p>	<p>Civil Rights (800 - 807)</p>
<p>Question #</p>	<p>803</p>
<p>Corrective Action Status</p>	<p>Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program.</p> <p>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. Corrected on-site; no further action needed. Statement provided:</p> <p>We do have the And Justice for All Posters displayed in every cafeteria, but additionally we will add to our Food Service Policy & Procedure Book which is distributed to every family at the beginning of every year along with the free and reduced applications. We will update our existing policy and update our website within the week.</p>
<p>Form Name</p>	<p>Civil Rights (800 - 807)</p>
<p>Corrective Action Status</p>	<p>Finding: Child observed to be denied a breakfast at HMS, with 4 minutes remaining in service time. USDA policy prohibits the denial of meals as a disciplinary action against <u>any</u> student who is enrolled in a school that participates in the Child Nutrition Programs, including:</p> <ul style="list-style-type: none"> • Disciplinary actions that directly result in loss or denial of meals • Requiring a child to work for his/her meals

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	CA: Provide a statement of understanding regarding how this will not occur in future. Have non-foodservice staff watch Civil Rights Powerpoint (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights), sign roster and upload roster to SNACS.
Form Name	Local School Wellness (1000 - 1006)
Question #	1000
Corrective Action Status	<p>Finding: Current LWP does not include all of the required content regarding Food and Beverage Marketing.</p> <p>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.</p>
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Question #	1601
Corrective Action Status	<p>Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).</p> <p>CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1217
Corrective Action Status	<p>Finding: Documentation of school food service staff training is maintained or tracked on a spreadsheet that does not contain all required elements per 7 CFR 210.30.</p> <p>CA: Include all required elements (add date of hire and employment status—full or part-time) on tracker for each employee and upload into SNACS. Corrected on-site; no further action needed.</p>
Form Name	Wisconsin School Day Milk Program
Question #	
Corrective Action Status	<p>Finding: Weighted average milk price not used for cost determination</p> <p>CA: Provide a statement of understanding regarding the requirement of using weighted average cost for the claim.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	404 - Hortonville Middle School
Corrective Action Status	Finding: Breakfast signage is not posted where students enter the service area and therefore is not seen by students.

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	<p>CA: Please Move signage to a location visible to students upon entry into the service are. Send a picture to the PHN indicating the new location.</p> <p>PHN has received, no further action needed.</p>
Form Name	Meal Components and Quantities - Review Period (400-408)
Question #	409 - Hortonville Middle School
Corrective Action Status	<p>Finding: Recipes exist, but many are not accurately reflecting what is happening in the kitchen.</p> <p>CA: Please submit updated Standardized Recipes for the following:</p> <ul style="list-style-type: none"> • Taco Meat • Taco Salad • Hot Deli Sandwich
Form Name	Buy American (1410-1411)
Question #	1410
Corrective Action Status	<p>Finding: Cantaloupe from Honduras was onsite without noncompliance documentation</p> <p>CA: Please provide a completed noncompliance form for the cantaloupe.</p>
Form Name	
Question #	
Corrective Action Status	

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Technical Assistance:		
TA Date	Question #	TA Area
04/03/2019	805	Civil Rights
All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable.		
04/03/2019	803	Civil Rights
SFAs should have procedures (written preferred) in place for handling civil rights complaints regarding discrimination in the NSLP and SBP. The SFA must provide complainants with 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 (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).		
04/01/2019	306	Meal Counting and Claiming
When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission. This is called an Accuclaim Report in Skyward.		
04/01/2019	305	Meal Counting and Claiming
Meals must be offered to all students each day school is in session a full day, so DPI has created Field Trip meal resources to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning). Counting/Claiming must occur when a reimbursable meal is received by an eligible student.		
04/01/2019	305	Meal Counting and Claiming
SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.		
04/01/2019	203	Verification
CO must review the application(s) to ensure the initial determination is correct prior to contacting the family. CO must sign and date back of application. Obligation to verify "for cause" all applications that may be questionable. Refer to the current Eligibility Manual. When benefit increases, change must take place within three days. When benefit decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.		
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.		

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04/01/2019	404	Meal Components and Quantities – North Greenville Elementary
<p>Signage helps students understand what components make up a reimbursable meal, and while the posted signage is very nice, please add the complete daily menu (include fruit and vegetables) to your signage. Vegetables on the garden bar are being used to meet the weekly vegetable requirements, portion sizes should be communicated to students with signage. Garden Bar Signage Templates can be found on our Signage webpage, under the heading Additional Signage Resources.</p>		
04/01/2019	404	Meal Components and Quantities – Hortonville Middle School
<p>Signage helps students understand what components make up a reimbursable meal, and while the posted signage is very nice, please add the complete daily menu (include fruit and vegetables) to your signage. Vegetables on the garden bar are being used to meet the weekly vegetable requirements, portion sizes should be communicated to students with signage. Garden Bar Signage Templates can be found on our Signage webpage, under the heading Additional Signage Resources.</p>		
04/01/2019	501	Offer vs. Serve – Hortonville Middle School
<p>Please continue to conduct refresher trainings with all staff</p>		
04/01/2019	501	Offer vs. Serve – North Greenville Elementary School
<p>Please continue to conduct refresher trainings with all staff</p>		
04/04/2019	1601	School Breakfast and Summer Food Service Program Outreach
<p>USDA requires all SFAs to inform families of where students can receive a free meal in the summer months. SFAs can: Promote the use of the summer meals locator on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site). Promote the calling of 211 to locate meals in the area. Promote texting 'food' to 877-877 to locate meals in the area. Promotion of the USDA Summer Food website (http://www.fns.usda.gov/summerfoodrocks)</p>		
04/01/2019	709	Resource Management – Revenue from Nonprogram Foods
<p>Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break and the PAID milk from milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines. Nonprogram Food costs and revenues must be separated from Program food costs and revenues.</p>		

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Please continue to conduct refresher trainings with all staff
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04/01/2019	900	On-Site Monitoring	
<p>Every school year, SFAs with more than one school must perform no less than one onsite review of meal counting/claiming system and the general areas, identified under 7 CFR 210.18(h) in each school operating the NSLP. Only 50% of schools operating the SBP must be reviewed; due by February 1. The forms have been updated to include general areas and a new, separate SBP program onsite review form (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review).</p>			
04/01/2019	124	Certification and Benefit Issuance	
<p>Households affected by a reduction or termination of benefits may reapply any time during the school year. 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.</p>			
04/01/2019	1105	Smart Snacks	
<p>At the time of the on-site review there were no competitive foods or beverages sold at NGES. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our Smart Snacks webpage</p>			
04/01/2019	1104	Smart Snacks	
<p>Ala carte items are sold and all items have been run through the Smart Snacks Calculator. All documentation has been printed and is kept on site. Food based fund raisers are not currently allowed during the school day, per school principal. Please see the final report for important information regarding fund raisers.</p>			
<p>Fund raiser are not held and ala carte items are not currently offered at North Greenville Elementary School. Please see the final report for important information regarding both fund raisers and ala carte items.</p>			
04/01/2019	453, 454, 466	Certification and Benefit Issuance	
<p>Children are eligible for free or reduced-price meal benefits on the date their eligibility is determined by the Determining Official. ? 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 become \$0 for the income on the application</p>			
<p>Run Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students. You are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run. Original file from download must be kept. The effective eligibility date for a DC eligible student is the date of the original output file</p>			
<p>USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an annual figure. Annual income is reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of current income. However, most households that receive regular pay checks, will report income based on what is currently earned and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.</p>			
04/01/2019	1411	Buy American	
<p>The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product.</p>			

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The following information must be recorded on a Buy American Non-Compliant Product List of your choosing: date, name of product, country of origin, and reason. This form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

A suggested Buy American - Non Compliant Product List template can be found on the Buy American webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american>). For more information on Buy American exceptions, visit the Buy American Provision Memos webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos>)