

# Administrative Review Report

453479 Mequon-Thiensville School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/30/2019	01/17/2020
On-Site Review	02/05/2020	02/07/2020
Site Selection Worksheet	10/31/2019	10/31/2019
Entrance Conference	02/05/2020	02/05/2020
Exit Conference	02/07/2020	02/07/2020
<b>Corrective Action Deadline</b>	<b>Monday, March 16th</b>	

## Commendations:

- Sincere thank you for responding to our offsite and onsite requests in a timely manner. Food service staff in the SFA are dedicated to serving students. Staff at both review sites displayed great rapport with students. Preparation and service spaces are clean and tidy. Thank you for all you do to serve the community.
- The district and food service management company (FSMC) work well together. Recently, the district and FSMC collaborated on a project to obtain feedback on programming from parents and students to increase participation, increase education/program promotion, and combat misinformation. The agency is working on releasing more detailed nutritional information from Nutrislice, has offered product samples, and gave tours of meal service areas during orientation for incoming students. Keep up the good work!
- The review period meals counts for Breakfast and Lunch were consolidated perfectly.
- The agency does a great job assembling a diverse local wellness policy committee. Agendas and meeting minutes are retained on the district's website, making the process transparent. When reviewing the current policy for updates, utilize the LWP Checklist found on the DPI SNT webpage. This will ensure minimum policy language content areas are covered.
- The SFA is working hard to increase awareness and education surrounding food allergies within the whole school environment.
- Free and Reduced Price meal applications are approved accurately and in a timely manner.
- It was noted that there is ample time for students to eat lunch at Wilson El and that students eat after recess. Both practices support healthy eating habits and contribute to less food waste. These outcomes should be highlighted in your LWP assessment and considered as a model for other schools.

## Recommendations:

- All food substitutions made outside of the meal pattern must be supported by a signed medical statement from a licensed medical professional and include the child's physical or mental impairment and how it restricts the child's diet; accommodations needed; foods to omit and recommended alternatives. Food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a written and clearly communicated policy for handling these types of accommodations.
- Allergen "Aware" Table: The SFA has a peanut "free" table. This practice is at the SFAs discretion. Consider stating that the school and table are peanut "aware" rather than "free" as this may present a false sense of security for parents and students. The SFA cannot possibly check every food item brought into the school. However, standard operating procedures can be implemented to properly clean the school environment and reduce risk of cross contact. For example, continue to discourage food sharing and encourage hand washing before and after eating. For more information see the CDC Tool kit, "Managing Food Allergies in Schools" <https://www.cdc.gov/healthyschools/foodallergies/toolkit.htm> .
- For adverse action related to a decrease in meal benefits from administrative review or the verification process, provide 10 calendar days from the date the letter is sent prior to changing the benefits status in the point of service system. This is the timeframe for households to appeal.
- Box G., on the free and reduced price meal application, which requires households to report the total household size is required in order to determine an income based application. Applications cannot be approved without this box filled out and/or clarified. Date and initial all phone or in-person communications on the application.
- Consider utilizing the DPI templates for Free and Reduced and Verification Notifications that go to the households. These templates are updated annually in June to ensure compliance with required content and can be distributed anytime after July 1.
- Check with your local sanitarian to see if s/he would like you to record breakfast milk temperatures on a log to ensure milk is temping at or below 41F prior to reusing/placing milk back under mechanical refrigeration.
- Consider utilizing the DPI SNT [SOP for Use of Milk Barrels: Monitoring of Temperature Option](#). Schools selecting this option may reuse milk if the temperature log shows that milk has been maintained at 41 degrees Fahrenheit or below when temperature of the barrel is monitored.

# Administrative Review Report

453479 Mequon-Thiensville School District

Findings and Corrective Action:

<b>Form Name</b>	<b>Certification and Benefit Issuance (100 - 121)</b>
<b>Question #</b>	110
<b>Corrective Action</b>	<p>Finding: The SFA's direct certification notification letter does not include all required information. Specifically, an explanation that the child is eligible for free benefits <i>without further application</i> (7 CFR 245.6).</p> <p>CA: Provide a statement that the SNT template letter will be used, or upload a corrected letter template for direct certification notification to the household into SNACS.</p>
<b>Form Name</b>	<b>Revenue From Non-Program Foods (709 - 711)</b>
<b>Question #</b>	709
<b>Corrective Action</b>	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA completed the Nonprogram Foods Revenue Tool, but did not include all required information into the tool (7 CFR 210.14).</p> <p>CA 1: Watch the Nonprogram Food Revenue webcast on the DPI website. Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS. <i>Once the tool is submitted, the reviewer will evaluate if NP food pricing is adequate and provide further guidance as needed.</i></p>
<b>Form Name</b>	<b>Local School Wellness (1000 - 1006)</b>
<b>Question #</b>	1000
<b>Corrective Action</b>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (food sold outside of school meal programs, foods provided- but not sold, food and beverage marketing, and nutrition promotion)(7 CFR 210.31).</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>
<b>Form Name</b>	<b>School Breakfast and Summer Food Service Program Outreach (1600 - 1601)</b>
<b>Question #</b>	1601
<b>Corrective Action</b>	<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>
<b>Form Name</b>	<b>Certification and Benefit Issuance (124 - 142)</b>
<b>Question #</b>	126
<b>Corrective Action</b>	<p>230 free and reduced price meal application determinations were reviewed,3 errors were identified. This is a very low error rate. Keep up the good work!</p> <p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a).Three student meal benefits were incorrectly calculated. See the SFA-1 provided by the consultant for details.</p> <p>CA: Notify the households of the correct meal benefit and/or clarify the determination. Provide a copy of the adverse action letter and/or a copy of the clarified free and reduced price meal application.  <b>Corrected onsite. No further action required.</b></p>
<b>Form Name</b>	<b>Verification (207 - 215)</b>
<b>Question #</b>	208
<b>Corrective Action</b>	<p>Finding: SFA did not complete a confirmation review before verifying application(s).</p> <p>CA: Review the verification section of the <a href="#">Eligibility Manual</a> 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>

# Administrative Review Report

453479 Mequon-Thiensville School District

<b>Form Name</b>	<b>Verification (207 - 215)</b>
<b>Question #</b>	211
<b>Corrective Action</b>	<p>Finding: The verification "We Must Check" notification letter, which includes a local letter on "Acceptable Eligibility Documentation" incorrectly defines the timeframe in which income or assistance program documentation can be reported to the SFA.</p> <p>The letter should state that documentation of income or receipt of assistance may be provided from <i>any point in time between the month prior to application and the time the household is required to provide income documentation for verification.</i></p> <p>CA1: Review the "Household Notification of Selection" section of the <a href="#">Eligibility Manual</a> (pg 106)                  CA2: Submit a statement indicating that the DPI template letter will be used moving forward, or upload an updated version of the SFAs verification notification letter into SNACS for approval.</p>
<b>Form Name</b>	<b>Verification (207 - 215)</b>
<b>Question #</b>	215
<b>Corrective Action</b>	<p>Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a).</p> <p>CA: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.</p>
<b>Site Name</b>	<b>Wilson EI</b>
<b>Form Name</b>	Meal Counting and Claiming - Day of Review (317-321)
<b>Question #</b>	318
<b>Corrective Action</b>	<p>Finding: The a la carte milk counting system is based on a classroom forecast/order rather than an accurate count at the point of service (POS), as the student receives the milk . This could result in a student's lunch account being charged for a milk that was not actually served.</p> <p>CA: Submit a statement in SNACS agreeing to track milk a la carte sales at the point of service, similar to how all other sales are handled at Wilson EI. If a manual student roster is used, make a second check at the POS when the student receives the milk and enter that mark into the software rather than the classroom forecast mark-- which could differ (e.g., ordered, but not actually taken).</p>

**Technical Assistance Entries:**

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/13/2020	1645	136	Sharing Free and Reduced Benefit Information	ALL				
Comments								
						Created By	Created Date	
<p>If a SFA offers the opportunity to waive or subsidize district fees (e.g. registration, athletic fees, technology fees, etc.) based on a student's free or reduced price meal status, the SFA must provide the Sharing Information with Other Programs form to all students with a free or reduced price status. These waivers or subsidies cannot be provided until a signed Sharing Information form is returned to the SFA.</p> <p>The Sharing Information form is not required if:</p> <ul style="list-style-type: none"> <li>•Parents/guardians self-disclose eligibility information by providing a copy of their application approval letter</li> <li>•The fee waivers and subsidies are handled outside of the food service department by an alternate data collection method Disclosure Agreements If a SFA distributes the Sharing Information with Other Programs form, it must also distribute a Disclosure Agreement form. This disclosure must be signed by any individual, or organization, that is receiving individual student free and reduced price information for purposes other than school meal benefits.</li> <li>•Any individual that is provided with individual student eligibility information for state reporting purposes or local program fee waivers should complete the Disclosure Agreement for School Staff and retain a copy on file at the district.</li> <li>•Any agency that is receiving free and reduced price meal benefit information for individual students should complete the Disclosure Agreement form and retain a copy on file.</li> </ul>						<p>2/13/2020 2:38:58 PM</p>		

# Administrative Review Report

453479 Mequon-Thiensville School District

02/13/2020	1644		Managing Unpaid Meal Charges	ALL				
Comments								
						Created By	Created Date	
<p>The SFA offers an alternate non-reimbursable meal as part of their policy to manage unpaid meal charges. The household is not charged for the alternate meal. Use of the alternate meal option is infrequent. Consider adding your alternate non-reimbursable meal to the Nonprogram food revenue tool to evaluate if costs are covered by nonprogram food revenue, and overall, the agency is in compliance with the Nonprogram food revenue ratio. If the ratio come out ok, the agency will not have to transfer/use funds from an outside account to cover the cost. Documentation and an understanding of how to calculate food cost per serving is critical.</p>								2/13/2020 1:48:42 PM
01/30/2020	1506	803	Civil Rights Complaint Procedures	ALL				
Comments								
						Created By	Created Date	
<p>All SFAs must have procedures in place for handling civil rights complaints in regards to discrimination <i>in the National School Lunch Program and School Breakfast Program</i>. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or State Agency within 5 days. Review the SNT example <a href="#">Discrimination Complaint Procedures Template</a> on the <a href="#">Civil Rights webpage</a>.</p>								1/30/2020 1:52:58 PM
01/30/2020	1505	900	Onsite Monitoring Form	ALL				
Comments								
						Created By	Created Date	
<p>WI SFAs should utilize the USDA onsite monitoring forms found on the School Nutrition Team (SNT) Onsite Monitoring webpage. There is one form for breakfast (50% of sites monitored every other year) and one for lunch (monitor every year). <a href="https://dpi.wi.gov/school-nutrition/program-requirements/on-site-monitoring">https://dpi.wi.gov/school-nutrition/program-requirements/on-site-monitoring</a></p>								1/30/2020 1:29:11 PM
01/17/2020	1371	1005	Local Wellness Policy Triennial Assessment	ALL				
Comments								
						Created By	Created Date	
<p>The SFA must inform and update the public about the assessment of the implementation of LWP. The assessment should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy (7 CFR 210.31). Consider utilizing the LWP Report Card and WellSAT online tool to complete the assessment, which is due June 30 2020. Share the final report/results with the public. <a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Local Wellness Policy Report Card Online Tool</a> - School Food Authorities (SFAs) must develop a triennial assessment report. The School Nutrition Team encourages using this tool to assess the extent to which schools comply with the wellness policy and provide a description of progress made in attaining the goals of the wellness policy. In addition, SFAs are encouraged to complete the <a href="#">WellSAT</a> to assess how your policy compares to a model policy. There is a section at the end of this tool to include your WellSAT results. Once the Local Wellness Policy Report Card form is submitted, a report will be generated and emailed to you. This report can be used to communicate the triennial assessment results to the public.</li> <li>• <a href="#">Local Wellness Policy Report Card Instructions</a> provide step-by-step directions for completing the Local Wellness Policy Report Card Online Tool.</li> <li>• <a href="#">Local Wellness Policy Report Card Sample</a> provides an example of the report that is generated once the Local Wellness Policy Report Card is completed.</li> </ul>								1/17/2020 12:21:27 PM