

Administrative Review Report

Howard-Suamico School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/30/2019	12/18/2019
On-Site Review	1/07/2020	1/10/2020
Site Selection Worksheet	10/27/2019	11/29/2019
Entrance Conference	1/07/2020	1/07/2020
Exit Conference	1/10/2020	1/10/2020
Corrective Action Due Date	2/26/2020	2/26/2020

Commendations:

Public Health Nutritionist (PHN): Great job interacting with students and getting feedback to help increase participation. Staff was willing and eager to make changes and implement suggestions from State Agency as well as students. Review materials were very well organized and uploaded into SNACS prior to the review, which helped to expedite the review process. Food Service Director (FSD) and Assistant Director were very friendly and easy to work with and appeared to have good rapport with staff. An in-house study was done on vegetable and fruit and posted on salad bar using DPI signage.

Nutrition Program Consultant (NPC): Thank you to the Food Service Director, food service staff and school staff for the courtesies extended to us during the on-site review. Thank you for being available to answer questions and provide additional information requested. Everyone was very friendly, helpful, and receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions in SNACS as well as pulling records for the on-site portion of the review. The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet School Nutrition Program regulations immediately, prior to and during the review. The FSD and Determining Official are very organized and receptive to suggestions. The FSD is extremely knowledgeable of the program requirements. The FSD is passionate and extremely motivated to run excellent school nutrition programs. Keep up the great work!

Findings and Corrective Action:

Form Name	Verification (207 - 215)	
Question #	211	
Due Date	2/26/2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged NPC 01/15/2020 03:58 PM	Finding: The verification notification letters did not contain all required information. Corrective Action: Submit a statement indicating that the DPI template letters will be used moving forward, or upload updated versions of the verification notification letters into SNACS for approval.
Form Name	Verification (207 - 215)	
Question #	214	
Due Date	2/26/2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged NPC 01/15/2020 04:06 PM	Finding: The SFA did not provide ten calendar days notice to the household(s) when benefits were reduced as a result of verification(7CFR 245.6a). Corrective Action: Submit a statement of understanding that ten

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		calendar days must be provided to households prior to reducing benefits, as a result of verification.
Form Name	Civil Rights (809 - 810)	
Question #	810	
Due Date	2/26/2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged NPC 01/15/2020 04:12 PM	Finding: The correct non-discrimination statement was not included on all notification letters. It must be in the unaltered formatting, in the same size, and same font as the content of the document. Corrective Action: Update all notification letters (DC, application approval, Verification "We Must Check" and "We Have Checked") to include the correct non-discrimination statement. Submit a statement this has been completed.
Site Name	All reviewed sites	
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
Due Date	2/26/2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged NPC 01/15/2020 04:30 PM	Finding: The Food Safety manuals are missing SOPs for Field Trips and the Sharing/No Thank You table. Work with your local sanitarian to get approval for the Sharing/No Thank You table SOP. Corrective Action: Add these SOPs to the Food Safety manuals and submit a statement when you have done so. Finding: The process 1, 2, and 3 foods list is missing in the Food Safety manuals. Corrective Action: Add the process 1, 2, and 3 foods list or highlighted menus deciphering the process 1, 2, and 3 foods to your Food Safety manuals. Submit a statement this has been completed.
Site Name	Bay Harbor Elementary	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
Due Date	2/26/2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged PHN 01/08/2020 10:03 AM	Finding: Signage was not posted at breakfast 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 breakfast signage should list the three components and inform students that under Offer versus Serve (OVS), they must select at least three food items, 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. Corrective Action: Submit a picture of complete signage posted near the breakfast service line
Site Name	Bay Harbor Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	

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Due Date	2/26/2020	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged PHN 01/21/2020 02:03 PM</p>	<p>Finding: Missing components; leftover entrée options offered without originally planned accompaniments or accompaniments were not properly documented on the production record. Monday 12/9 – confetti pancakes were offered, but no m/ma (22 meals). Wednesday 12/11 – hamburger patties were offered, but no grain (11 meals). 33 meals are subject to fiscal action Corrective Action: Submit a statement regarding how changes to the planned menu, including offering leftover entrees as reimbursable meals other days during the week, will be handled to ensure that meal pattern requirements are still being met. Provide training for staff on production record requirements and the importance of documenting all items served as part of the reimbursable meal. Submit proof that this training occurred (a signed training roster or if using the DPI Production Records webcast, the confirmation email received after completing the quiz may be submitted).</p>
Site Name	Suamico El and Bay Harbor Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
Due Date	2/26/2020	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged PHN 01/21/2020 02:34 PM</p>	<p>Finding: Weekly grain shortage at lunch due to Sun Butter sandwich/string cheese meal offered daily. Corrective Action: Added a 1 oz eq spikerz cracker packet to the meal. This was corrected prior to the on-site review. Going forward will switch to 2oz eq m/ma + 2oz eq grain turkey sandwich. NO FURTHER ACTION NEEDED.</p>
Site Name	Bay Harbor Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
Due Date	2/26/2020	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged PHN 01/21/2020 02:29 PM</p>	<p>Finding: Daily fruit shortage at breakfast- 12/12, the cereal entrée option was only offered ½ cup of fruit according to the production records (strawberry cup may have been offered, but it was not documented). Corrective action: In addition to production record training requested in Q409, submit the completed production record for SBP on 1/9 at Bay Harbor.</p>
Site Name	Bay Harbor Elementary	
Form Name	Offer vs Serve (500-502)	
Question #	500	
Due Date	2/26/2020	
Corrective Action Status	Flagged	

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Corrective Action History	Flagged PHN 01/15/2020 02:17 PM	<p>Finding: Food service staff were unclear about the Offer versus Serve (OVS) requirements for lunch. Several students did not have three full components (ex. french toast sticks and fruit) or a full 1/2c of fruit/veg. These students were stopped by the FSD and sent back to complete their meal. Although all students observed took a reimbursable meal, it is important for staff to understand the OVS requirements. Resources on WI DPI's Menu Planning webpage may be used as training resources or staff can watch the OVS webcast (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning, https://dpi.wi.gov/school-nutrition/training/webcasts#ovs).</p> <p>Corrective Action: Have staff responsible for determining reimbursable meals complete 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	Bay Harbor Elementary	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
Due Date	2/26/2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged NPC 01/16/2020 06:30 PM	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a statement of where the most recent food safety inspection report will be posted and visible to the public.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/09/2020	1362	700	Administrative Review	ALL	FSD			NPC
Comments								
Unpaid Meal Charge Policy					Created By		Created Date	
USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a "Nutshell". For a more comprehensive overview, see SP 23-2017 for best practices, local meal charge policy checklist, sample outstanding balance letter and a sample robo-call script.					NPC		1/16/2020 6:57:22 PM	
01/09/2020	1361	700	Administrative Review	ALL	FSD			NPC
Comments								
Refunds					Created By		Created Date	
Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they can't be used to offset another student's negative account, unless paid households have chosen to donate those funds to the school food service account, or the money is going to another sibling in the district. All funds left in any					NPC		1/16/2020 6:55:51 PM	

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student meal account, which cannot be contacted, must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property.									
01/09/2020	1360	705	Administrative Review	ALL	FSD			NPC	
Comments									
Visiting Students					Created By		Created Date		
School age students visiting for lunch, may take a reimbursable meal, be charged the student lunch price, and be claimed in the paid category. Keep documentation to support they took a reimbursable meal. If you prefer to charge the visiting student for the meal and not claim them, they do not have to take a reimbursable meal, but must be charged the adult meal price or at least charged enough to cover all costs for their items.					NPC		1/16/2020 6:54:05 PM		
01/09/2020	1359	812	Administrative Review	Bay Harbor Elementary	FSD			NPC	
Comments									
Special Dietary Needs					Created By		Created Date		
For special needs students, check for IEP and make sure students are being offered everything on the menu, giving them a choice of what they want for meals if they are not coming to the cafeteria. Make sure school staff is aware of this and allowing students to choose their reimbursable meal. Educate staff on Offer vs. Serve and the point of service (POS) so that staff is documenting which students took a reimbursable meal. POS documentation must be submitted to food service.					NPC		1/16/2020 6:41:16 PM		
01/09/2020	1334	812	Administrative Review	Bay Harbor Elementary	FSD			NPC	
Comments									
Special Dietary Needs					Created By		Created Date		
The SFA has a peanut "free" table. 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.					NPC		1/15/2020 4:40:25 PM		
01/09/2020	1333	1007	Administrative Review	ALL	FSD			NPC	
Comments									
Local Wellness Policy					Created By		Created Date		
Use the Wellness Policy Checklist to review the LWP. Regarding the Triennial Assessment, complete an assessment of the Local Wellness Policy by June 30, 2020. To do this, use the WellsAT on wellsat.org to evaluate the assessment. Then use the WI Team Nutrition Local Wellness Policy report card to continue the assessment. Once these are completed, make the results known to the public via email, newsletter, social media, or posting it to the school website.					NPC		1/15/2020 4:15:13 PM		
01/09/2020	1332	207	Administrative Review	ALL	FSD			NPC	

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Comments									
Verification Collection Report					Created By			Created Date	
Always record the total number of approved applications as of October 1 on the FNS-742 (Verification Collection Report). All Direct Certifications must be documented as of October 31.					NPC			1/15/2020 3:55:34 PM	
01/09/2020	1331	138	Administrative Review	ALL	FSD				NPC
Comments									
Transfer Students					Created By			Created Date	
When a student transfers in midyear, the Determining Official (DO) can request documentation to support the child's benefit status from the former school. Appropriate documentation would be a copy of the approved application or the Direct Certification (DC) output match file. If you received a copy of the approved application, the DO must re-determine, sign, and date it. A notification letter of eligibility must be sent out in both cases.					NPC			1/15/2020 3:53:42 PM	
01/09/2020	1330	134	Administrative Review	ALL	FSD				NPC
Comments									
Start Date of Eligibility					Created By			Created Date	
The effective eligibility date for a directly certified student is the date of the original output file of the day that Direct Certification was completed.					NPC			1/15/2020 2:46:59 PM	
01/08/2020	1387	500	Administrative Review	Bay Harbor Elementary	FSD				PHN
Comments									
Offer vs. Serve (OVS)					Created By			Created Date	
If special needs students are not coming through the line, ensure that they are being offered the opportunity to choose their meal with OVS or that they are provided a complete meal (milk, ½ cup fruit, ¾ cup veg and planned menu entrée). They should also be offered a milk variety.					PHN			1/21/2020 2:38:41 PM	
01/08/2020	1386	500	Administrative Review	Bay Harbor Elementary	FSD				PHN
Comments									
Fruit and Vegetable Requirement					Created By			Created Date	
Keeping fruit and/or vegetable options at the point of service to help students select a reimbursable meal can be helpful to avoid having to send them back. This could include applesauce cups, fresh fruit, baby carrots, etc.					PHN			1/21/2020 2:37:22 PM	
01/08/2020	1385	409	Administrative Review	Bay Harbor Elementary	FSD				PHN
Comments									
Production Records					Created By			Created Date	
Production record should be updated to reflect accurate crediting for the Yogurt Parfait as the recipe does not contain any grain.					PHN			1/21/2020 2:17:03 PM	
01/08/2020	1384	410	Administrative Review	Bay Harbor Elementary	FSD				PHN

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Comments						
Leftovers				Created By		Created Date
Occasional small quantities of leftovers do not need to be included in a menu analysis. While it is up to the SFA to interpret this definition, Bay Harbor had leftovers daily that were offered again later in the week (ex. Mon- 51 hamburgers left over). If these leftovers were considered towards meal pattern requirements, this would have resulted in a weekly grain minimum of 7oz eq vs 9oz eq (after the sun butter sandwich meal was corrected), which would have been short of the K-5 requirement.				PHN		1/21/2020 2:14:31 PM
01/08/2020	1382	1410	Administrative Review	Bay Harbor Elementary	FSD	PHN
Comments						
Buy American				Created By		Created Date
For domestic products without country of origin labeling (COOL), consider the Buy American Provision Attestation for Agricultural Product(s) Purchased Between School and Contractor (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision. The following products did not have a clear COOL: BBQ sauce, baked beans, cheez-its, trix yogurt, grapes, ranch, mixed berry juice, Spikerz, Tony's french bread pizza.				PHN		1/21/2020 12:49:51 PM