

# Administrative Review Report

Shawano School District

## Review Schedule:

On-Site Review	03/27/2023	03/28/2023
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## Commendations:

Thank you to all administrative staff, school nutrition professionals, and the Food Service Director for your cooperation during this administrative review. It was great to be able to see so many child nutrition programs in operation including School Breakfast Program, National School Lunch Program, Wisconsin School Day Milk Program, and Afterschool Snack Program. By utilizing all of these programs, it's clear that the children in Shawano School District have access to the nutrition they need to start and end the day so they can focus on their academic success.

## Recommendations:

For information on the USDA Child Nutrition Programs, visit the DPI School Nutrition webpage. For in depth technical assistance, including program links see the 2022-23 General Program Reminders which has been uploaded to the documents tab in SNACS.

Our annual School Nutrition Summer Training will return in the Summer of 2023. Information and registration will be posted in Spring 2023. There will be in-person at several locations around the state and virtually through live, instructor-led online courses. Please see our School Nutrition Summer Training webpage to learn more (<https://dpi.wi.gov/school-nutrition/training/school-nutrition-summer-training>).

## Findings and Corrective Action:

<b>Form Name</b>	Meal Counting and Claiming (300 - 311)
<b>Question #</b>	305
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	Finding: Unpaid Meal Charge Policy cannot say students "may" be permitted to accumulate negative food service balance. May is too ambiguous and may result in a civil rights violation. CA: Please update the policy to remove ambiguous language.
<b>Form Name</b>	Meal Counting and Claiming (314 - 316)
<b>Question #</b>	315
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	Finding: With site-based claiming all schools must be counted and claimed by school site and LEAD's breakfast claim is combined with Hillcrest Primary and this is unallowable. CA: All students must be coded and claimed to their own school entity. Please work with your software provider to correct this issue. Submit the Accuclaim for all schools for the month of April before the April claim is submitted.
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)
<b>Question #</b>	700
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	Finding 1: On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). CA 1: Review the Annual Financial Report webcast or manual on the DPI website then update the 2021-22 Annual Financial Report with revenues and expenses broken out by program and category. Upload the corrected report into SNACS. Once approved,

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	the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)
<b>Question #</b>	709
<b>Corrective Action Status</b>	CAP Submitted
<b>Corrective Action History</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 (Adult meals and milk) (7 CFR 210.14).</p> <p>CA 1: Watch the Nonprogram Food Revenue webcast on the DPI website (<a href="https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html">https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html</a>).</p> <p>CA 2: Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.</p>
<b>Form Name</b>	Indirect Costs (712)
<b>Question #</b>	712
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Indirect costs are being charged to the nonprofit school food service account, which is unallowable in Wisconsin (Insert detail here).</p> <p>CA: All costs charged to the nonprofit school food service account must be made into direct costs. Identify if indirect charges can be made into direct costs using time studies, meters, etc. Determine what the direct cost would be. If the indirect amount charged is greater than the direct cost calculated, the difference will need to be refunded to the nonprofit school food service account for SY 2021-22 through the Administrative Review. Any indirect costs that cannot be made into direct costs are unallowable and also need to be refunded.</p>
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	803
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>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. <a href="#">Template Civil Rights Complaint Procedures</a></p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1000
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31).</p> <p>CA: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1002

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<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) is/will be reviewed and updated.</p> <p>CA: Provide a plan on when and how the LWP will be reviewed and updated.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1003
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: SFA did not invite a diverse group of stakeholders to participate in the committee to develop, update and review the LWP per 7 CFR 210.31.</p> <p>CA: Provide a statement of understanding that the LWP committee must invite a diverse group of stakeholders.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1005
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: SFA has completed a triennial assessment of the Local Wellness Policy (LWP) but did not complete both the LWP Report Card and the WellSAT 3.0 to meet this requirement.</p> <p>CA: Complete the LWP Report Card and the WellSAT 3.0 of the Local Wellness Policy assessment and upload into SNACS.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	126
<b>Corrective Action Status</b>	CAP Submitted
<b>Corrective Action History</b>	<p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected.</p> <p>CA: Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS.</p> <p>We have sent out letters to the families identified in the audit that their benefits will be changing. We modified the sample from the DPI and we included a new paper application in the mailing. We determined the date that they can appeal and when benefits will be revoked. We have summer school next week so we did not include this in the 10 days for the revocation of benefits but we did in the appeal. I will attach the letters for review.</p>
<b>Form Name</b>	Verification (207 - 215)
<b>Question #</b>	208
<b>Corrective Action Status</b>	CAP Submitted
<b>Corrective Action History</b>	<p>Finding: SFA did not complete a confirmation review before verifying application(s).</p> <p>CA: 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>

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<b>Form Name</b>	Verification (207 - 215)
<b>Question #</b>	213
<b>Corrective Action Status</b>	CAP Submitted
<b>Corrective Action History</b>	<p>Finding: The SFA's notice of adverse action did not contain all required information (7 CFR 245.6a).</p> <p>CA: Review the Notice of Adverse Action section of the Eligibility Manual on pg 57. Submit a statement that either the DPI template letter will be used moving forward, or upload an updated copy of the adverse action letter that the SFA will use moving forward into SNACS for approval.</p>
<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)
<b>Question #</b>	1400
<b>Corrective Action Status</b>	CAP Submitted
<b>Corrective Action History</b>	<p>Finding: The food safety plan was not site specific. Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).</p> <p>CA: Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school and upload the updated food safety plan(s) into SNACS.</p> <p>Updates to be site specific, also uploaded in SNACS (in 2 parts)</p>
<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)
<b>Question #</b>	1403
<b>Corrective Action Status</b>	CAP Submitted
<b>Corrective Action History</b>	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <ul style="list-style-type: none"> <li>Citrus Sun Apple juice - USA, Germany, Hungary, Chile, and/or China</li> <li>Citrus Sun OJ - USA, Brazil, and/or Mexico</li> <li>Fresh green and red bell peppers - Product of Mexico</li> <li>Crushed pineapple, canned - Product of Philippines</li> <li>Indian Summer applesauce - "distributed by"</li> <li>Frozen broccoli -Product of Mexico</li> </ul> <p>Corrective Action: Update and submit your Noncompliant Product List Form with the non-domestic products listed above.</p> <p>Indian Summer Applesauce is made from US grown apples out of Michigan. Re submitted into snacs</p>
<b>Site Name</b>	Brener El
<b>Form Name</b>	Meal Counting and Claiming - Day of Review (317-321)
<b>Question #</b>	317
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. Prices for student meals are visible on the computer screen at the point of service that can be seen by students; which constitutes overt identification.</p> <p>CA: Work with your software provider to ensure overt identification is not occurring or install screen protectors on monitors. Corrected on site no further action required.</p>

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<b>Site Name</b>	Brener El
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)
<b>Question #</b>	404
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Under Offer versus Serve, signage must indicate that students must select at least ½ cup fruit and/or vegetable, or a combination with a reimbursable meal. Currently, breakfast signage is for a serve model and does not list the 1/2 cup fruit and/or vegetable, or combination of both requirement.</p> <p>Corrective Action: Submit a picture of the supplementary signage. New signage was printed and posted during onsite review. No further action required.</p>
<b>Site Name</b>	Brener El
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	431
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Production records are intended to be useful tools to record information prior to production, during production and following production. It communicates the plan of the day and how the plan was executed. As a communication tool, it is beneficial to have "all hands on deck" to understand and complete production records. All staff members should have access to this document to know which recipes are being used, which items are being served, and what portion sizes are planned for the day. Currently, at Olga Brener Elementary not all staff have access to the production records to know the plan for the day, rather, this information is communicated from one person. The more detailed the production record, the clearer the plan for the day will be. For example, menu items such as "breakfast sandwich" or "choice of cereal" or "juice selection" should include recipe numbers, variety recipes, or have the options listed, i.e. "apple juice" "orange juice." The production record column for "purchase units prepared," "number of servings prepared" and "Students served" is being filled out incorrectly. For example, at breakfast on 2/6/23 Mini Pancakes were served. The serving size was 1 pouch. The purchase units prepared should reflect the number of cases, rather than the number of servings prepared which was 144 servings. With 72 ct/case, the "purchase units prepared" would be 2 cases. For breakfast potatoes, 4 bags is listed across all three columns.</p> <p>Finding: Production records were not consistently filled in correctly on production records during the week of review (2/6-2/10). Occasionally, items served are not documented, such as juice, on the breakfast production record 02/09/23. Additionally, not all staff members are using production records, or have access to production records.</p> <p>Corrective Action: Have all staff review the DPI webcast, "Production Records" (<a href="https://media.dpi.wi.gov/school-nutrition/final-production-records/story.html">https://media.dpi.wi.gov/school-nutrition/final-production-records/story.html</a>). Please upload certificates of completion for staff members who viewed the webinar.</p>
<b>Site Name</b>	Brener El
<b>Form Name</b>	Offer vs Serve (500-502)
<b>Question #</b>	500
<b>TA Log #</b>	TA Log# exists
<b>Corrective Action Status</b>	Flagged

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<b>Corrective Action History</b>	<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 breakfast. The planned meal was cereal (1 item) and graham crackers (1 item) or breakfast sandwich (2 items), and juice (1 item), peaches (1 item), celery (1 item), and milk (1 item). The breakfast Offer versus Serve (OVS) requirements are not fully understood by all staff as staff were placing graham crackers on trays for students taking cereal, even if they had three items already, and were making students take celery if they hadn't taken a milk with cereal. OVS resources on WI DPI's Offer Versus Serve section on the Meal Planning webpage may be used as training resources (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/offer-versus-serve">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/offer-versus-serve</a>). In particular the breakfast OVS tips sheet <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-ovs-handout.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-ovs-handout.pdf</a> and the OVS e-learning resources may be helpful <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/offer-versus-serve#:~:text=7/21/15-,Training,-Offer%20versus%20Serve">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/offer-versus-serve#:~:text=7/21/15-,Training,-Offer%20versus%20Serve</a> ).</p> <p>CA: Have staff responsible for determining reimbursable meals at breakfast 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>
<b>Site Name</b>	Brener El
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)
<b>Question #</b>	1406
<b>Corrective Action Status</b>	CAP Submitted
<b>Corrective Action History</b>	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>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.</p>
<b>Site Name</b>	Brener El
<b>Form Name</b>	Wisconsin School Day Milk Program
<b>Question #</b>	4
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Milks are being claimed based on attendance counts or another counting system rather than an appropriate point of service count. Point of service counts (POS) for the Wisconsin School Day Program (WSDMP) must be recorded as the students receives a milk.</p> <p>CA1: Submit a detailed statement, outlining how the school has changed the accountability system for claiming milk to include an approved POS.</p> <p>CA2: Provide two weeks of WSDMP counts with the corrected counting system. Upload in SNACS.</p> <p>CA3: Retrain staff on the new POS procedures. Upload documentation to support the training that was completed and staff sign in sheet into SNACS.</p>
<b>Site Name</b>	Brener El
<b>Form Name</b>	Wisconsin School Day Milk Program
<b>Question #</b>	7
<b>Corrective Action Status</b>	Flagged

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<b>Corrective Action History</b>	<p>Finding: SFA did not accurately determine the cost per half pint of milk for the Wisconsin School Day Milk Program (WSDMP). CA: Provide a statement on how the cost of milk for the WSDMP will be determined moving forward.</p>
<b>Site Name</b>	Brener El
<b>Form Name</b>	Afterschool Snack Program
<b>Question #</b>	3
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Point of service afterschool snack counts are not being maintained to support the claims for reimbursement. CA: Provide a statement that describes how Afterschool Snack counts will be recorded at the Point of Service and maintained for three years plus the current school year. Submit 30 consecutive operating days of Afterschool Snack POS check off sheets. Fiscal action will apply.</p>
<b>Site Name</b>	Brener El
<b>Form Name</b>	Afterschool Snack Program
<b>Question #</b>	4
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Afterschool Snack counts were incorrectly counted and claimed. Snacks are not being checked off as student receives. (7 CFR 210.10). CA: Correct the issue and provide the next month's afterschool snack menu, claim and 30 consecutive operating days of ASP point of sale snack counts. Fiscal Action may apply.</p>
<b>Site Name</b>	Brener El
<b>Form Name</b>	Afterschool Snack Program
<b>Question #</b>	6
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Snacks provided for the Afterschool Snack Program did not meet the minimum meal pattern requirements of offering two different components. CA: Review the Afterschool Snack Program meal pattern on the Afterschool Snack webpage at <a href="https://dpi.wi.gov/school-nutrition/programs/afterschool-snack">https://dpi.wi.gov/school-nutrition/programs/afterschool-snack</a>. Provide an updated Afterschool Snack menu that includes two different components each day. Fiscal action will apply to non-reimbursable snacks claimed during the review month and day of observation if students only took one component.</p>
<b>Site Name</b>	Brener El
<b>Form Name</b>	Afterschool Snack Program
<b>Question #</b>	7
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The Afterschool Snack onsite monitoring was not completed within the required timeframes. (7 CFR 210.9) CA: 1. Provide a statement of understanding that the Afterschool Snack Program must be monitored twice each year at each site it is operated at. Once during the first four weeks of the program plus one additional time during the program year.</p>

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## Technical Assistance Entries:

### Comments

The printed menu should list all components included with the reimbursable meal. Currently at breakfast, "fruit or juice" selection is listed; however, students may select both to meet their 1 cup fruit offering at breakfast. Recommend removing the "or" between fruit and juice. In addition, the printed menu for breakfast states that there are fresh fruit and vegetable options available on the fruit and vegetable bar; however, this is actually not available at breakfast. Recommend removing this statement from the breakfast menu.

### Comments

When vegetables on the garden bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. 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>).

### Comments

There is confusion over the difference between Offer Versus Serve (OVS) and the planned menu. The planned menu must be in compliance with all meal pattern requirements, both daily and weekly (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#menuplanningtools>). OVS occurs solely during meal service. Therefore, the printed menu, recipes, portion sizes on production records, etc. should reflect the menu and portion sizes as planned. During onsite review, school nutrition professionals were confused about the 1/2 cup requirement under OVS, instead thinking it was 1/4 cup. However, it appeared that the confusion was between the planned menu (1/2 cup green beans and 1/4 cup garden bar) and the 1/2 cup requirement on a reimbursable meal tray. While vegetable offerings can be made in as little as 1/8 cup requirements as long as the daily minimum requirement is met, the amount required on a reimbursable meal tray is 1/2 cup fruit, vegetable, and/or both. Thus, the 1/4 cup of beans was offered in addition to the 1/2 cup green beans to meet the requirement of 3/4 cup vegetables.

### Comments

Although standardized recipes were in place for the menu items, Italian Stromboli and deli ham sandwich, during the day of onsite review, staff members were not following them correctly. As written, the stromboli recipe called for 3 oz of USDA deli ham and the deli sandwich 1.85 oz of ham. However, instead of being measured out, a total of 8 slices (5.5 oz) were put on the stromboli and 3 slices on the ham sandwich (1.95 oz). While this did not result in any component shortages, both quantities were in excess of the written recipe and thus contributes to additional calories, sodium, and saturated fat. For the stromboli, in particular, not following the recipe led to an excess of 70 oz (4.375 lb) of ham being used. In addition, the mozzarella cheese was not measured out but "eyeballed" to reach the needed 14 oz (by weight). Standardized recipes are those that have been tried, tested, evaluated, and adapted to your food service operation. They are intended to be followed exactly to produce a consistent, quality product that credits a specific way and to help with foodservice costs.

## Special Dietary Needs

- The USDA requires that schools participating in the National School Lunch Program and accepting federal dollars must accommodate all special dietary requests signed by a state authorized medical authority, written in an IEP and/or a 504 plan.
- **Policy Requirements-** At a minimum School Food Authorities (SFAs) participating in the USDA Child Nutrition Programs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Districts develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination.  
The School Nutrition Team has created a [Special Dietary Needs Policy template](#) which can be modified to fit the needs of your school or district. If your district already has a policy in place, we recommend comparing it to this policy to ensure your policy includes all important information.
- **Medical Statement** - It is recommended, but not required, for SFAs to use the prototype [Medical Statement](#) for Special Dietary Needs posted on the DPI SNT website. This template is available in English, Spanish, and Hmong. At a minimum the statement must include:



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1. an explanation of how the child's physical or mental impairment restricts the child's diet
  2. the food(s) to be avoided
  3. the food or choice of foods that must be substituted
  4. The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI.
- A signed medical statement from a state authorized medical authority does not need to meet meal pattern requirements provided the statement supports food substitutions made outside of the meal pattern requirements.
  - SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or fall within offer vs. serve. for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance.
  - SFAs may offer students a fluid milk substitute that is nutritionally equivalent to cow's milk with a request from a parent or guardian. SFAs must get pre-approval from the DPI School Nutrition Team by completing the [Fluid Milk Substitute Approval Form](#). A [List of Allowable Fluid Milk Substitutes](#) is provided on the Special Dietary Needs webpage; however, SFAs are responsible for ensuring the substitute they are providing meets the nutrition requirements.
  - Resources - The [Special Dietary Needs Flowchart](#) outlines the process of accommodation determination. The [USDA Q&A on Accommodating Special Dietary Needs resource](#), the [USDA Special Dietary Needs Handbook](#), and [Q&As: Milk Substitution for Children with Medical or Special Dietary Needs \(Non-Disability\)](#) contain additional detailed information.

## Local Wellness Policy

- [Local Wellness Policy In a Nutshell](#) provides an overview of policy requirements.
- [Local Wellness Policy Checklist](#) is a resource that will help schools determine if all required content areas are included in their LWP.
- **The triennial assessment must be completed, at minimum, once every three years.** It requires SFAs to describe how the language in the SFA's LWP compares to the model LWP, measure the SFA's compliance with its LWP, and describe the SFA's progress toward meeting its LWP goals.
- [Local Wellness Policy Triennial Assessment Report Card](#) - **SFAs must use the Wisconsin Local Wellness Policy Triennial Assessment Report Card** in order to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two. Please note that the online version of the Wisconsin Local Wellness Policy Report Card has been discontinued. **The Triennial Assessment Report Card does not need to be submitted to the DPI School Nutrition Team.** The Triennial Assessment Report Card should be kept on file for your next DPI Administrative Review. In addition, the results of the triennial assessment should be made available to the public.
- [Local Wellness Policy Builder](#) is an online tool designed to assist schools/districts in creating comprehensive school wellness policies that meet the final rule established by the USDA in August 2016.
- [Local Wellness Policy Builder - Full Text](#) is a compilation of all statements available in the [Local Wellness Policy Builder Online Tool](#).

## Certification and Benefit Issuance

- When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) (IEG) one would look at the amount of their income under the column indicating that stated frequency.
- Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may be processed at face value.
- However, households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, e.g., weekly, biweekly, bimonthly, or monthly.

## Public Release

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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
- Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.))
- Local employment office
- Major employers contemplating or experiencing large layoffs

SFAs are allowed to, but not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

## Non-discrimination Statement (NDS)

- When including the [non-discrimination statement](#) on letters, menus, websites, and documents used to convey program information, it is necessary to use the most current **full** official statement. The full non-discrimination statement was revised by the USDA in 2022. The abbreviated statement remains the same.
- The abbreviated statement, “**This institution is an equal opportunity provider**”, is only used when space is limited, such as printed menus. All non-discrimination statements must be in the same size font as document’s main text. Statement words and formatting cannot be altered.
- Additional languages are found on the [USDA FNS Non-discrimination](#) webpage.

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (**including gender identity and sexual orientation**), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA’s TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant’s name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

### 1. mail:

U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or

### 2. fax:

(833) 256-1665 or (202) 690-7442; or

### 3. email:

[program.intake@usda.gov](mailto:program.intake@usda.gov)

This institution is an equal opportunity provider.

## Processes for Complaints

- Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.

# Administrative Review Report

Shawano School District

- All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the [Template Civil Rights Complaint Procedures](#) to create written procedures.
- An SFA may always attempt to resolve a situation that is occurring in real time; however, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.
- If a complaint of discrimination is received at your district, the following procedures should be followed:
  1. Document the complaint using the [USDA Program Discrimination Complaint Form \(Espanol\)](#).
  2. Submit complaints within five days of receiving the complaint to:
 

Wisconsin Department of Public Instruction (DPI)

    - Mail:
 

Director, School Nutrition Team  
125 S. Webster Street  
Madison, WI 53707-7841
    - Fax: (608) 267-0363
    - Email: [jessica.sharkus@dpi.wi.gov](mailto:jessica.sharkus@dpi.wi.gov)
  3. Maintain a [Civil Rights complaint log](#) at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members with a legitimate need to know.

## Annual Financial Report (AFR)

- The [Annual Financial Report Manual](#) is located on the DPI website to assist you with completing the AFR.
- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance.
- The school food service fund may not have an ending fund balance more than three-month operating expenses, as this is considered "Excess Cash Balance". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three-month average of operating expenses to remain in compliance with a non-profit status.
- The categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc.
  - 'Food' is expenses for edible food items and beverages.
  - 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold.
  - 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc.
  - 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings.
  - When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

## Equipment

Equipment purchased with funds from the nonprofit school food service account with a cost that exceeds the School Food Authority's (SFA's) capitalization threshold (or \$5,000, whichever is less), you will need to receive **prior approval**.

1. Review the [Equipment Preapproval List](#). If the equipment purchase is listed, no further action is needed. If the equipment purchase is **not** on this list, the PI-6206 form must be completed.
2. [Complete a Equipment Preapproval Request Form \(PI-6206\) \(Instructions\)](#)