

Administrative Review Report

Mondovi School District

Commendations:

From Public Health Nutritionist:

Thank you to all staff at Mondovi 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 Nutrition Program Consultant:

Our sincere thanks to the administration and school nutrition staff at Mondovi School District. We appreciate the time and effort spent preparing for and participating in the administrative review process. Thank you for your availability during the on-site portion of the review and helping the DPI review team to gather the needed documentation and information. Thank you for what you do for kids!

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.

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT offers School Nutrition Summer Training online and in various locations around the state. Find more information on these training opportunities on the DPI School Nutrition Training webpage (<https://dpi.wi.gov/school-nutrition/training>).

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Findings and Corrective Action:

Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	102	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	Flagged 03/28/2023 04:14 PM	<p>Finding: When households submit online apps, SFA needs to keep track of what program was entered by following up with the household and making a note in the system what program correlates with the 10 digit case number listed. Best practice would be to print off the detail of the income app and write if they were approved Free or Reduced, and any other details needed like program name. Then the determining official will sign and date.</p> <p>Corrective Action: Submit a statement of how you plan to ensure online applications submitted with a case number are determined, approved or denied properly regarding program name.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	Flagged 01/31/2023 02:19 PM	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (Food and Beverage Marketing policy statement, Triennial Assessment policy statement, policy statement regarding updating/informing the public) and some included content does not meet standards (School Meals policy statement does not reference USDA guidelines, Foods Sold Outside School Meal Program statement does not explicitly disallow non-Smart Snack compliant items) (7 CFR 210.31).</p> <p>Corrective Action: 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>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	Flagged 03/28/2023 04:39 PM	<p>Finding: For some students, the start date of eligibility did not match with when the application on file was determined nor when a Direct Certification run was completed. The start date of eligibility for an application is the date the application is determined eligible followed by the signature and documented date by the Determining Official. For Direct Certification, the start date of eligibility is the date the Direct Certification run is completed.</p> <p>Corrective Action: Submit a statement of understanding regarding the start date of eligibility.</p>
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Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	132	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 03/28/2023 04:23 PM</p>	<p>Finding: The direct certification (DC) list does not contain all of the required information. Four full enrollment direct certification runs are required to be completed during the school year at the following time frames:</p> <p>1st: beginning of the year (between July 1 - first day of school)</p> <p>2nd: three months after first run (between October - December)</p> <p>3rd: six months after first run (between January - March)</p> <p>4th: between March 15 and April 1 (for CEP proxy report) Direct certification is updated weekly which means the most you could run DC and see any new matches would be weekly. Best practice is to run the full enrollment through monthly. It is also best practice to run a partial DC run when new students enroll and you need to check if they qualify for free or reduced-price meals through DC.</p> <p>Corrective Action: Submit a statement of when you plan to complete full enrollment runs to meet the requirement.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	134	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 01/31/2023 08:17 PM</p>	<p>Finding: The SFA did not perform Direct Certification (DC) in the required timeframes (7 CFR 245.6) Full Enrollment DC runs must be performed at least 3 times each school year: at or around the beginning of the school year, 3 months after the initial match and again 6 months after the initial match (7 CFR 245.6).</p> <p>Corrective Action: Provide a statement of how and when the SFA will perform the full enrollment DC runs in the required time frames during the school year.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 03/28/2023 04:59 PM</p>	<p>Finding: SFA did not have documentation to support that a confirmation review occurred before verifying application(s).</p> <p>Corrective Action: 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. Additionally, the confirming official must sign and date the application(s) chosen for Verification following that the application(s) were determined correctly.</p>

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Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 02/01/2023 03:58 PM</p>	<p>Finding: The correct nondiscrimination statement was not included on all required program materials (SFA website).</p> <p>Corrective Action: Add the correct Nondiscrimination statement to required program materials and upload a screenshot of the updated webpage into SNACS. The correct nondiscrimination statement can be found on the USDA website: https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-other-fns-programs</p>
Site Name	Mondovi Hi	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	402	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 02/01/2023 08:24 AM</p>	<p>Finding: On the day of review, it was observed that the incorrect scoop size was being used to serve mashed potatoes to the high school students. The production record indicated a serving size of 4 ounces, which is ½ cup, but a no. 16 scoop (1/4 cup) was used. The appropriate scoop for ½ cup serving is a no. 8 scoop. There were also several instances on the production records from the week of review that the FSD did not use correctly use weight versus volume measurements. Technical assistance was given on using correct scoop sizes, as well as when to use weight measurements versus volume measurements.</p> <p>Refer to this chart for determining when to use weight versus volume: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/weight-vs-volume-chart.pdf</p> <p>Corrective Action: Submit a statement explaining how the serving size for mashed potatoes will be fixed for the day of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.</p>
Site Name	Mondovi Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 01/31/2023 11:25 AM</p>	<p>Finding: The daily minimum requirement for vegetables was not met for the 9-12 meal pattern for lunch on Wednesday, December 7th. The following represent the planned portion sizes: chili (1/2 cup = 1/8 cup R/O), baked beans (1/2 cup beans/peas), coleslaw (1/4 cup other). Only 7/8 cup of vegetables were offered in total for Wednesday, December 7 th . The daily minimum requirement for 9-12 grade group is 1 cup.</p>

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		Corrective Action: Describe specifically how the daily minimum requirement for vegetables will be met for lunch during the day containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).
Site Name	Mondovi Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	431	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status		
Corrective Action History	Flagged 02/01/2023 08:26 AM	Finding: The grab-and-go items (salads and wraps) were not consistently filled in daily on production records during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production. Corrective Action: Submit one full week of completed production records, including the grab-and-go items, recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.
Site Name	Mondovi Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	434	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	Flagged 01/31/2023 01:12 PM	Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. There was no standardized recipe for mashed potatoes. Corrective Action: Submit a standardized recipe for mashed potatoes. Be sure to include all requirements of a standardized recipe, including serving size and yield.
Site Name	Mondovi Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	437	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	Flagged 01/31/2023 11:16 AM	Finding: There was a weekly red/orange vegetable subgroup shortage at lunch during the week of review. Only 1 1/8 cups red/orange vegetables were offered over the course of the week, which does not meet the minimum 1 1/4 cup requirement for the 9-12 meal pattern. Corrective Action: Submit a statement explaining how this weekly red/orange vegetable subgroup shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.

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Site Name	Mondovi Hi	
Form Name	Civil Rights (811-812)	
Question #	811	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 01/31/2023 01:53 PM</p>	<p>Finding: The nondiscrimination "And Justice for All" poster is not located in a publicly visible area (FNS Instruction 113).</p> <p>Corrective Action: Provide a statement and or image of how this requirement will be met. If corrected while onsite, no further action required.</p>
Site Name	Mondovi Hi	
Form Name	SFA On-Site Monitoring (901 - 904)	
Question #	901	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 03/28/2023 06:05 PM</p>	<p>Finding: SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p>Corrective Action: Submit a plan on how on-site monitoring will be completed for each school and program moving forward and who will be responsible.</p>
Site Name	Mondovi Hi	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 03/29/2023 04:28 PM</p>	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Post the most recent food safety inspection in a publicly visible location. Corrected onsite, no further action required.</p>
Site Name	Mondovi Hi	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		

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Corrective Action History	Flagged 01/31/2023 02:31 PM	<p>Finding: While the FSD does have a Noncompliant Product List Form available onsite, the following products were identified in the SFA's storage area as non-domestic and are not documented:</p> <ul style="list-style-type: none"> o Solid pack sliced apples – Italy o Dole fruit gels – Thailand o Black olives – Morocco o Cucumbers – Mexico <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products listed above.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/01/2023 02:00 PM	<p>Finding 1: On the Annual Financial Report, the revenues and expenses (labor and food) for WSDMP were not documented properly. Under the WSDMP, milk sold to Paid students is a Nonprogram food. This is due to WSDMP being a State program, not Federal. The Paid student milk must be paid for by the student or a Non-federal fund can cover the cost (not Fund 50). If a Non-federal fund is covering the cost of the milk, a transfer must be made to Fund 50 to cover the cost of all paid student milk served during the school year in the WSDMP and documented on the Annual Financial Report.</p> <p>Corrective Action 1a: Determine the expenses for the WSDMP (labor, food, etc.) that incurred during the 21-22 SY, specifically the expenses for the Free and Reduced student milk served and submit the amounts in SNACS.</p> <p>Corrective Action 1b: Determine the expenses of the milk served to Paid students for the WSDMP (labor, food, etc.) during the 21-22 SY and submit the amounts in SNACS.</p> <p>Finding 2: The total revenue accrued for WSDMP from the prior school year was not listed on the Annual Financial Report.</p> <p>Corrective Action 2: Submit a statement of understanding that the Revenue accrued for WSDMP must be documented on the AFR annually.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/31/2023	3316	305	Administrative Review	ALL	FSD			
Comments								
						Created By		Created Date
Unpaid Meal Charge Policy • Per USDA policy memo SP 46-2016, no later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to unpaid meal charges. Policies developed at the SFA level must be provided to the state agency during the administrative review. • Must explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in hand to cover the cost of their meal at the time of service. o If a child has money to purchase a reduced-price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay unpaid charges if the child intended to use the money to purchase that day's meal. • Should be implemented and enforced SFA-wide. • Local discretion to vary policy based on student grade level. • Must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school								3/28/2023 6:21:16 PM

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district during the school year. Only posting the policy to the school website does not meet the requirement. • Must be provided in writing to all school or SFA-level staff who are responsible for policy enforcement. SFAs are encouraged to provide information about the policy to principals and other school or district administrators to ensure the policy is supported. o Schools may not enlist the assistance of unauthorized persons, such as parent or guardian volunteers, to follow up with debt collection efforts. • Policies regarding the collection of unpaid meal charges should be included in the written unpaid meal policy. • SFAs are encouraged to review the policy on a regular basis (e.g., annually or biannually).								
01/31/2023	3315	200	Administrative Review	ALL	Verifying Official			
Comments								
					Created By	Created Date		
When completing Verification, keep copies of the pay stubs (any documentation to verify the application) with a copy of the approved application chosen for Verification. Keep all documentation paperclipped together and retain as part of the records retention requirement.						3/28/2023 6:18:20 PM		
01/31/2023	3309	209	Administrative Review	ALL	Verifying Official			
Comments								
					Created By	Created Date		
When completing Verification, review the Gross income and compare it to what was documented on the application by the household. Do not use the the net income.						3/28/2023 5:05:58 PM		
01/31/2023	3308	132	Administrative Review	ALL	Determining Official			
Comments								
					Created By	Created Date		
When a student qualifies for free or reduced-price meals through an application but then matches on Direct Certification, Direct Certification most always will trump an application determination. However, there is one case where an application will trump a DC determination. If a student was approved for Free meals through an application but was matched on DC as Medicaid - Reduced, then the application would trump DC and the student would stay as free eligible.						3/28/2023 4:47:43 PM		
01/31/2023	3337	801	Administrative Review	ALL	FSD			
Comments								
					Created By	Created Date		
Public Release 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: o Local news media o Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.) o Local employment office o 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.						3/29/2023 4:44:01 PM		
01/31/2023	3336	1400	Administrative Review	ALL	FSD			
Comments								
					Created By	Created Date		
Sharing and No Thank You Tables Both sharing tables and no thank you tables are permitted in Wisconsin and do not require approval from the DPI SNT. However, there are considerations for School Food Authorities (SFAs) and Local Educational Agencies (LEAs) that must be followed to safely and responsibly implement each type of table. Refer to the Sharing and No Thank You Tables Toolkit for a comprehensive guide including standard operating procedures. • Definitions: o A sharing table is a designated table for food and beverage items that students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. Throughout meal service, the designated food handler(s) or trained supervising adult(s) must monitor the sharing table, inspect items for wholesomeness, and document items that are leftover. The table should not be located immediately after the point of service. o A no thank you table is a designated table placed after the point of service for food and beverage items that students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, the designated food handler(s) or trained supervising adult(s) must inspect the items for wholesomeness and document items that are leftover. • Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority.						3/29/2023 4:42:21 PM		

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Implementation may vary across the state. • Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.								
01/31/2023	3306		Administrative Review		Determining Official			
Comments					Created By	Created Date		
Application Approval - When a household submits an application with a 10 digit case number but lists EBT as the program, follow up with the household to confirm which program they were referring to. W-2 cash benefits and FoodShare are the only programs (with a 10 digit case number on an application) that qualify households for free school meals. Outdated Spanish Free and Reduced Meal Application- When a household submits an application that is from a previous school year, have them complete a new application for the current school year.						3/28/2023 3:52:24 PM		
01/31/2023	3335	1211	Administrative Review	ALL	FSD			
Comments					Created By	Created Date		
The Food Service Director is required to have 12 hours of training hours each school year. A school year is from July 1- June 30. Refer to the Professional Standards In a Nutshell. https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf						3/29/2023 3:46:23 PM		
01/31/2023	2798	435	Administrative Review	Mondovi Hi	FSD			
Comments					Created By	Created Date		
A recipe used during the review week (wraps) lacked pieces of information necessary for standardized recipes (specify type of protein). Technical assistance was provided on-site to analyze each portion of the recipe. This is needed for menu planning to ensure that the portions offered are actually what is intended. Please use our Standardized Recipes webpage to aid in this process (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).						1/31/2023 3:01:07 PM		
01/31/2023	2796	431	Administrative Review	Mondovi Hi	FSD			
Comments					Created By	Created Date		
Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. FSD frequently indicates ounces as the serving size for fruits and vegetables. Technical assistance was given on using volume measures to record portion sizes of fruits and vegetables and using weight measures to record portion sizes of M/MA and grains.						1/31/2023 2:50:20 PM		
01/31/2023	3333	805	Administrative Review	ALL	FSD			
Comments					Created By	Created Date		
Special Dietary Needs - If it is determined that a separate eating area would be best for the student this should be written into an IEP. In this case, the adult picking up the student's meal will need to put all items available on the tray for the student to choose from. The adult may not choose for the student based on "what the student likes to eat". Leftovers cannot be consumed by adults. Per SP26-2017: May an SFA serve meals to children with disabilities in an area separate from the cafeteria where the majority of the school children eat? Federal civil rights legislation, including Section 504 of the Rehabilitation Act of 1973, IDEA, and Titles II and III of the ADA, requires that in providing nonacademic services, including meals, school districts must ensure children with disabilities participate along with children without disabilities to the maximum extent appropriate. This allows children to interact with and learn from other children with backgrounds different from their own. However, under some circumstances it may be appropriate to require children with certain special needs to sit at a separate table. For example, if a child requires a large amount of assistance from an aide in order to consume their meals, it may be necessary for the child and the aide to have more space during the meal service. Additionally, SFAs may determine a separate, more isolated eating area would be best for children with severe food allergies. Prior to developing a special seating arrangement, the SFA should determine, with input from the child's family and physician, if this type of seating arrangement would truly be helpful for the child. If the SFA does develop a special seating arrangement, other children should be permitted to join the child						3/29/2023 2:25:43 PM		

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with the food allergy, provided they do not bring any foods that would be harmful to the child. SFAs may not, however, segregate children from the regular meal service due to their disability simply as a matter of convenience, and it is not appropriate to simultaneously use a separate table to segregate children who are being punished for misconduct. 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.								
01/31/2023	2793	403	Administrative Review	Mondovi Hi	FSD			
Comments								
					Created By	Created Date		
The printed menu should list all components included with the reimbursable meal. Currently, a milk variety is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered as part of the reimbursable meal.						1/31/2023 1:49:20 PM		
01/31/2023	2792	410	Administrative Review	Mondovi Hi	FSD			
Comments								
					Created By	Created Date		
Fruits and vegetables on a garden bar can credit towards the meal pattern. Even with garden bars, the menu planner must plan a specific portion size that they intend students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/2 cup each should be communicated to students. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected.						1/31/2023 1:23:46 PM		