

Administrative Review Report

Stanley-Boyd School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/13/2023	03/17/2023
On-Site Review	03/27/2023	03/29/2023
Site Selection Worksheet	02/13/2023	02/13/2023
Entrance Conference	03/27/2023	03/27/2023
Exit Conference	03/29/2023	03/29/2023

Commendations:

From the NPC: Thank you for completing the questionnaire and uploading documents into SNACS prior to the onsite visit. Stanley-Boyd staff were very welcoming and open to State Agency feedback. I appreciate staff availability during the onsite visit to review documents and answer questions. The Determining Official does a great job managing the benefit issuance list.

From the PHN: Thank you to the staff at Stanley-Boyd School District for the warm welcome and cooperation during the Administrative Review (AR). Thank you to the FSD for being available during the on-site portion of the review and helping us to gather the needed documentation and information. Thank you for keeping organized records of production records, crediting documentation, and Buy American tracking forms. The breakfast menu for the week of review met all meal pattern requirements. Thank you for serving healthy, nutritious meals to your students!

Recommendations:

No Recommendations found for this review.

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Findings and Corrective Action:

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	<p>Flagged 03/29/2023 09:57 AM</p>	<p>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).</p> <p>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, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.</p> <p>Finding 2: The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The SFA is not aware of what the funds can be spent on and the funds are not being tracked separately.</p> <p>CA: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent. It is recommended the SFA utilize the Supply Chain Assistance (SCA) Funds Expense Tracker.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/06/2023 11:14 AM</p>	<p>Finding 1: The SFA completed the Nonprogram Foods Revenue Tool but did not sufficiently increase nonprogram food prices to meet the ratio requirement (7 CFR 210.14). CA 1: Using the SFAs current Nonprogram Foods Revenue Tool, modify the nonprogram food prices until the tool shows the ratio is in compliance. Upload a copy of the updated Nonprogram Foods Revenue tool into SNACS. CA 2: Submit a statement of understanding that the Nonprogram Foods Revenue Tool is required to be run annually and utilized to set nonprogram food pricing to ensure compliance with this requirement. The prices adjusted in the updated tool should be used to set prices in the following school year.</p> <p>Finding 2: Food expenses for catering events are removed from Fund 50 and applied to Fund 10 through internal journal entries. SFA is not accurately tracking all expenses and revenue of nonprogram foods. (7 CRF 210.14(f)). CA: Going back from the beginning of the 2022-23 SY expense all nonprogram foods purchased by foodservice and record as revenue to Fund 50. Fund 50 should invoice the program or organization receiving the food (Fund 10). Then Fund 10 must pay Fund 50 through a check or a digital transfer.</p>
Site Name		
Form Name	Indirect Costs (712)	
Question #	712	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/29/2023 09:27 AM</p>	<p>Finding: Indirect costs are being charged to the nonprofit school food service account, which is unallowable in Wisconsin Fund 50 is billed for 75% of trash removal services without documentation on file to make this a direct cost. Custodial labor is billed at 17% to food service and principal labor is billed at 10% for lunch monitor duties based on a time study from 2021-2022.</p>

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		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, bag studies, 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 2022-23 only for the shared labor costs and SY 2019-20 through the Administrative Review for the trash services.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/29/2023 12:55 PM	Finding: The SFA's food service specific civil rights complaint procedure is missing the following: "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." (FNS Instruction 113-1). CA: Provide a timeline for when this will be added to the existing district policy. Provide the name and title of the SFA representative that will ensure compliance. It is recommended the SFA adapt the Template Civil Rights Complaint Procedures for SFAs .
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/21/2023 01:09 PM	Finding: Current Local Wellness Policy (LWP) does not include all of the required content (triennial assessment) (7 CFR 210.31). 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.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/06/2023 11:11 AM	Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years. CA: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 03/28/2023 05:45 PM	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. CA: Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error and indicate the date 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.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/29/2023 11:49 AM	Finding: The non-discrimination statement was not included on all required program materials (Local Wellness Policy and Food Service Management Board Policy). CA: Add the full Nondiscrimination statement to required program materials and upload updated materials into SNACS.
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/29/2023 12:00 PM	Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30). CA: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities. It is recommended that non-school nutrition staff who are responsible for the Point of Service (POS) complete additional training on POS and Offer Versus Serve (OVS).
Site Name	Stanley EI	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/28/2023 12:21 PM	Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). The point of service (POS) did not provide a reliable or accurate meal count due to being at the front of the line before students have their reimbursable meal. CA: Correct the POS to ensure accurate counts are tracked. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.
Site Name	Stanley EI	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	409	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 04/06/2023 10:16 AM	Finding: Fiscal action is required for a missing component. Therefore, fiscal action will be assessed for 231 meals on Monday, February 13th, the day with the missing milk component at Stanley Elementary. Corrective Action: Submit a statement of understanding that only meals that were offered all meal pattern components, in at least their minimum required amount, may be claimed for reimbursement. In addition, state what changes will be made to the milk ordering and inventory kept on-site to avoid this issue going forward.
Site Name	Stanley EI	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/29/2023 07:38 AM	Finding: There was a weekly grain and meat/meat alternate shortage for the week of review with the daily alternate menu option. Each day, 1 Sunwise Sunbutter and Grape Jelly Sandwich is offered as an alternate entrée. 1 sandwich provides 1.5 oz eq grain and 1 oz eq meat/meat alternate. Although this meets the daily grain and meat/meat alternate requirements, this will not meet the weekly requirements for the K-8 meal pattern. -Grain Component: 7.5 oz eq offered during the week of review; 8 oz eq grain required weekly -Meat/Meat Alternate Component: 5 oz eq offered during the week of review; 9 oz eq meat/meat alternate required weekly Corrective Action: State what will be done to the menu during the week of review so that 8 oz eq grain and 9 oz eq meat/meat alternate are offered to students over the course of the week.
Site Name	Stanley EI	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/29/2023 07:46 AM	Finding: The daily minimum requirement for the Vegetable component was not met for K-8 for lunch during the week of review. The following represent the planned portion sizes: Tuesday (2/14): Steamed Broccoli, 1/2 cup Wednesday (2/15): Steamed Carrots, 1/2 cup The daily minimum requirement for the K-8 meal pattern is 3/4 cup vegetable. Corrective Action : Describe specifically how the daily minimum requirement for the Vegetable component will be met for lunch during the days containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).
Site Name	Stanley EI	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	437	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/29/2023 07:47 AM	Finding: There was a missing vegetable subgroup during the week of review. Zero cups of the "Other" subgroup were offered to students. Corrective Action 1: State what will be done to correct the menu during the week of review so that all vegetable subgroups are offered. Corrective Action 2: Submit verification that FSD has completed training on the Vegetable Components (e.g. SNT Vegetable Component webcast): https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns~:text=GOALS%3A%20Elective-,The%20Vegetable%20Component,-Learn%20about%20the Upload the course certificate into SNACS.
Site Name	Stanley EI	
Form Name	Wisconsin School Day Milk Program	

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Question #	10	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/29/2023 10:00 AM	Finding: Documentation was not available to determine if the milk served as part of the Wisconsin School Day Milk Program (WSDMP) meets the criteria for "Wisconsin produced milk". Wisconsin produced milk means that all or part of the raw milk used by the milk processor was produced in Wisconsin. Per the Agreement for the WSDMP the SFA agrees to serve Wisconsin produced milk. CA1: Submit documentation showing the milk used in the WSDMP is produced or partially produced in Wisconsin. Documentation may include a statement from the distributor, milk invoices showing where the milk is produced or any other documentation showing the milk used in the WSDMP is a Wisconsin agricultural product. CA2: Provide a statement of understanding that procurement documents for milk must include language that WI produced milk be provided for this program.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/29/2023	3332		Administrative Review		Food Service			
Comments								
						Created By		Created Date
All SFAs must have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. 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. SFAs are strongly encouraged to adopt the DPI SNT template civil rights complaint procedures.								
03/29/2023	3331		Administrative Review		Food Service			
Comments								
						Created By		Created Date
Section 206 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) amended section 12 of the Richard B. Russell National School Lunch Act by establishing requirements related to the revenue from the sale of nonprogram foods. Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CRF 210.14(f), SFAs are required to ensure: All revenue from the sale of nonprogram foods accrues to the non-profit school food service account and revenue available to support the production of reimbursable school meals does not subsidize the sale of nonprogram foods. In the USDA Child Nutrition Programs, foods offered are part of a reimbursable meal (required meal pattern foods) or not part of a reimbursable meal and considered nonprogram foods. Foods that are not part of a reimbursable meal—nonprogram foods—are subject to nonprogram foods revenue rules. Nonprogram foods revenue rules require that all costs of a nonprogram food are covered by nonfederal funds (the purchaser or some fund other than Fund 50). Nonprogram foods include any non-reimbursable foods and beverages purchased using funds from the nonprofit school food service account. This encompasses all foods sold in schools as well as adult meals, foods sold outside of school hours, or any foods used for catering or vending activities. For the majority of SFAs, a la carte foods offered during meal service are the largest share of nonprogram foods								
03/29/2023	3330		Administrative Review		Food Service			
Comments								
						Created By		Created Date
Students Present at the Point of Service (POS) - 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. 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								

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simultaneously use a separate table to segregate children who are being punished for misconduct. If it is determined that a separate eating area would be best for a student, this should be written into an IEP or a 504 plan. 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.								
03/29/2023	3328		Administrative Review		Food Service			
Comments								
					Created By	Created Date		
<p>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.</p> <ul style="list-style-type: none"> • 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. 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 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. 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). 						3/29/2023 10:48:03 AM		
03/29/2023	3321		Administrative Review		FSD			
Comments								
					Created By	Created Date		
<p>Training: Every summer, the School Nutrition Team (SNT) hosts School Nutrition Summer Training both 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).</p>						3/29/2023 7:55:26 AM		
03/29/2023	3320	400	Administrative Review	Stanley EI	FSD			
Comments								
					Created By	Created Date		
<p>Breakfast Food Items: The menu planner has the discretion to determine how to credit certain food items. The definition of a food item at breakfast is ½ cup fruit, 1 oz eq grain, and 1 cup milk. Therefore, if an apple is served that credits as 1 cup fruit, the menu planner can choose whether the apple will count as one or two items. The same goes for grains. A 2 oz eq muffin may count as one or two items. Remember, the crediting must be clearly communicated to students and staff.</p>						3/29/2023 7:54:05 AM		
03/29/2023	3319	404	Administrative Review	Stanley EI	FSD			
Comments								
					Created By	Created Date		
<p>Signage: 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 must list the three components and the four items offered, and must communicate to students that under Offer versus Serve (OVS), they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Please update your current signage and reposition it, so that it is more visible to students at the beginning of the line.</p>						3/29/2023 7:53:03 AM		
03/29/2023	3318	410	Administrative Review	Stanley EI	FSD			

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Comments									
					Created By			Created Date	
Menu Planning Worksheets: Menu planning worksheets are helpful tools to ensure meal pattern requirements are met at both breakfast and lunch. These can be found on the NSLP Menu Planning webpage, under the Menu Planning Tools heading (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).								3/29/2023 7:51:35 AM	
03/29/2023	3317	437	Administrative Review	Stanley El	FSD				
Comments									
					Created By			Created Date	
Vegetable Subgroups: The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students get a variety of nutrients each week, the lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Refer to the Vegetable Subgroups handout (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) to identify vegetables in each subgroup.								3/29/2023 7:50:22 AM	
03/28/2023	3314		Administrative Review		Food Service				
Comments									
					Created By			Created Date	
DPI SNT will allow schools who cannot get Wisconsin produced milk (live on the border) to participate in WSDMP, but there should be language in their procurement documents to show they requested WI produced milk and be able to show documentation on why they were unable to receive it.								3/28/2023 6:12:54 PM	
03/28/2023	3313		Administrative Review		Food Service				
Comments									
					Created By			Created Date	
Milk Substitutes in WSDMP: 1. A statement from a medical provider for a substitute is not required since this language is not included in the statute, so the request may be accepted from anyone. The reason does need to be for an allergy, metabolic disorder or other condition that prohibits him/her from drinking milk as stated in the statute. A parent note that my child does not like milk as a preference, would not be acceptable. 2. A juice substitute is 8oz to be consistent with the serving of milk. Discretion can be used if a 6oz juice box is served, this would be ok.								3/28/2023 6:12:24 PM	
03/28/2023	3312		Administrative Review		Food Service				
Comments									
					Created By			Created Date	
For students receiving a benefit through an extension from another household member, please add the name of the household member within the benefit issuance list to document who the benefits are extended through.								3/28/2023 6:09:05 PM	
03/28/2023	3311		Administrative Review		Food Service				
Comments									
					Created By			Created Date	
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.								3/28/2023 6:06:39 PM	
03/28/2023	3310		Administrative Review		Food Service				

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Comments	Created By	Created Date
All food substitutions made outside of the meal pattern must be supported by a signed medical statement from a licensed medical professional or included in the student's individual education plan (IEP) 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 policy for handling these types of accommodations. (7 CFR 210.10(m)(1) and 7 CFR 210.10(m)(2)).		3/28/2023 6:03:40 PM