

Administrative Review Report

142525 Herman-Neosho-Rubicon School District

Review Schedule	Start Date	End Date
Off-Site Review	01/24/2019	02/25/2019
On-Site Review	04/03/2019	04/04/2019
Site Selection Worksheet	(150) Honor Intermediate	
Entrance Conference	04/03/2019	04/03/2019
Exit Conference	04/04/2019	04/04/2019
Corrective Action Deadline	May 8, 2019	

Commendations:

- Thank you for all the hard work that has been put into preparing for the offsite and onsite review. We also appreciate your flexibility in using our new SNACS software review system!
- Your large and colorful signage communicating what students may select for a reimbursable lunch was impressive!
- It is a great practice to locate the garden bar at the beginning of the serving line at lunch. Students clearly enjoy having this option, as nearly all students took foods from the garden bar on the day of lunch observation.
- Honor Intermediate has very low food waste, indicating that students understand Offer versus Serve.
- Having separate tray colors for each entrée option is a great way to increase efficiency in the serving line.
- Thank you for sending the Expiring School Meal Benefits reminder letter to your households. This is not required, but is certainly a best practice, which helps manage unpaid meal charges and improves meal access.
- The food preparation and service areas are clean and tidy! The food service director thoroughly reviews and updates the food safety plan annually and uses it as guide to train staff.

Recommendations:

- The Local Wellness Policy (LWP) contains all required minimum content areas. Part of the triennial assessment has been completed, which compares the SFAs LWP to a model policy. As a reminder, the other part of the triennial assessment is evaluating the extent to which is the SFA complies with the LWP goals and objectives. Once the full assessment is complete, it must be made public. In addition, the assessment must be completed SFA-wide.
- The SFA utilized the 18-19 SY PLE flexibility. The flexibility is an option for all SFAs again in the 19-20 SY, but SFAs need to have a zero or positive fund balance as of December 31, 2018. If you have a negative fund balance as of 12/31/18, the SFA must run the PLE tool to determine how to set paid student lunch prices. The SFA is advised to review student paid breakfast and adult meal prices at the same time. Even if an SFA has a positive fund balance, prices may need to be evaluated to ensure all costs of producing the meal are covered, so that Fund 50 does not require an end of the year operating transfer.

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Findings and Corrective Action:

Form Name	Meal Counting and Claiming (300 - 311)
Corrective Action	<p>Finding: The SFA is simply posting the unpaid meal charge policy on the district website. This does not meet the policy communication requirement. Per SP 57-2016 Q5, while posting the policy online, or sending it to families by email is helpful, it will not ensure the information reaches all households, particularly those without access to a computer or internet.</p> <p>CA: Outline how the SFA will improve unpaid meal charge policy communication. Consider including the policy in the Back-to-School packet with other registration materials, in a student handbook that is received annually, or including the policy with free and reduced application materials at the start of the school year.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)
Corrective Action	<p>Finding: SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14. The SFA sells the following nonprogram foods: adult breakfast, adult lunch, extra milk, breakfast entrees, breakfast sides, adult garden bar, adult lunch entrée, and paid WSDMP milks.</p> <p>CA: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5-day reference period from the current school year.</p>
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Corrective Action	<p>Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).</p> <p>CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Corrective Action	<p>80 free and reduced price meal application determinations were reviewed, 2 errors were identified.</p> <p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). Two applications were not determined correctly due to missing/incorrect household information. See the SFA-1 form provided by the consultant for details.</p> <p>CA: Contact household(s) with incomplete application(s) and request the missing information. Completed onsite. No further action required.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Corrective Action	<p>Finding: Two internal staff have access to F/R information and may not have a legitimate "need to know". This is based on discussion with staff, meal observation, and the SFAs unpaid meal charge policy. The SFA must limit access of F/R information to only those with a legitimate "need to know".</p> <p>CA: Notify the consultant of the outcome (to continue or discontinue access) for both individuals. If access to free and reduced meal data is desired, provide a legitimate reason for access, which will be reviewed. For anyone receiving F/R meal data for federal and state reporting purposes, the Disclosure Agreement Form (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement-school-staff.docx) must be signed and on file at the district.</p>

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Form Name	Verification (207 - 215)
Corrective Action	<p>Finding: The Verification Collection Report (VCR) is inaccurate. The sample application was reported in Section 5 as R → R, rather than F → P. The SFA did not complete direct verification.</p> <p>CA: The VCR can no longer be amended. By signing off on this report, the SFA acknowledges and understands errors made and how to correct them moving forward. No further action required.</p>
Form Name	Verification (207 - 215)
Corrective Action	<p>Finding: Applications selected for verification were not verified correctly per 7 CFR 245.6a. The application should have been changed from Free to Paid. Income is too high to qualify for free or reduced benefits based on the bi-weekly gross income verified.</p> <p>CA: Send a letter of adverse action informing the household of the reduction in meal benefits. Provide 10 calendar days for the household to appeal prior to changing the benefit in the point of sale system. Attach a copy of the letter to the document tab in SNACS. Corrected onsite. No further action required.</p>
Form Name	Meal Counting and Claiming (314 - 316)
Corrective Action	<p>Finding: SFA is not following the current approved contract, which states that the agency is charging \$0.30 for a reimbursable reduced student breakfast. Upon review of the SFAs point of sale daily activity report, the system is programmed to charge \$0.40. Per USDA regulations, the breakfast reduced price charge to students cannot exceed 30 cents.</p> <p>CA: Reprogram the price within your software to ensure the maximum amount charged for a reimbursable reduced student breakfast is 30 cents. Submit a screen shot from your point of sale software showing the correction was made. Upload this under the documents tab in SNACS. The SFA is encouraged to credit household accounts for the amount that was overcharged.</p>
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Site Name	Honor Intermediate
Corrective Action	<p>Finding: SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. The current purchase prices for student meals are visible on the computer screen at the point of service that may be seen by students; which constitutes overt identification. The point of sale staff do not need to know a student's meal eligibility to enforce the local unpaid meal charge policy. Therefore, there is no reason for the current purchase price to show. Point of sale staff have had civil rights training.</p> <p>CA: Work with your software company to deactivate this function to ensure overt identification is not occurring or install screen protectors on monitors. Submit a screen shot from your software system to show the point of sale current purchase price has been removed. Completed. No further action required.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)
Site Name	Honor Intermediate
Corrective Action	<p>Finding: All required information was not filled in on the breakfast production records during the week of review, including the number of servings prepared for each item, the actual</p>

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	<p>varieties of fruit offered, and the number of meals served. Additionally, multiple menu items were written in on the same line of the production record, resulting in imprecise documentation of actual usage for each menu item.</p> <p>Corrective Action Needed: Submit one week of completed breakfast production records. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date. Review the Production Record Requirements for what is required to be on production records (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p>
Form Name	SFA On-Site Monitoring (901 - 904)
Corrective Action	<p>Finding: SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p>CA: Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Site Name	Honor Intermediate
Corrective Action	<p>Finding: Practices were observed that conflict with the SOP for Use of Milk Barrels: Monitoring of Temperature Option. The SFA is not logging the temperature of the milk (when inserted and at the end of service) to show milk temperature has been maintained at or below 41 F prior to placing it back under mechanical refrigeration.</p> <p>CA: Begin logging milk temperatures. Submit a week of completed milk barrel logs for Honor Intermediate School. Upload the log to SNACS under the documents tab.</p>

Technical Assistance:
Salad Bar Signage
<p>If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as ½ of the volume served.</p> <p>The School Nutrition Team (SNT) has a Salad Bar Signage Template with pictures that can be posted on a garden bar (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).</p>
Production Records
<p>Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Overall, the lunch production records submitted for the week of review were thorough and clear. However, milk usage was not documented one day during the week of review. Additionally, a few items contained tally marks in the amount prepared column. A unit (pounds, cans, pans, etc.) should be added to these items for clarification.</p>
Prepared Quantities at Breakfast
<p>Consider preparing more of each menu item at breakfast instead of having to replenish the line during service. All of the items offered on the current breakfast menu could be offered on the serving line again, as long as they are kept under the appropriate temperature control while on the serving line. Having a well-stocked serving line may also visually appeal to students when they are deciding whether or not to participate in breakfast.</p>
Breakfast Participation and Service Models

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Breakfast Participation at Honor Intermediate is low in comparison to the lunch participation rates. Consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break to help increase student participation. Breakfast in the Classroom works well for elementary students and mid-morning models work well in middle or high school students where they have a passing time to grab a meal between classes. This could be set up in the cafeteria or on mobile carts in the hallways.

Breakfast in the classroom is associated with the highest participation rates, which can be as high as 98 percent of the school's enrollment. Other service methods, such as Grab 'n Go and breakfast after first period, correlate with increases as much as 15-40 percent of current participation. If breakfast is offered in a convenient way for students, they will participate in the program. Additionally, greater participation equates to more students being ready to learn, as well as higher levels of government reimbursement, which results in more revenue for the school.

The [Breakfast Resources](https://dpi.wi.gov/school-nutrition/school-breakfastprogram/resources) webpage contains a wealth of information about the different breakfast service models (<https://dpi.wi.gov/school-nutrition/school-breakfastprogram/resources>). For questions on breakfast models or ideas to increase participation, contact the School Breakfast Program Specialists (DPISBP@dpi.wi.gov).

The Wisconsin School Meals Rock! [School Nutrition Outreach Toolkit](https://dpi.wi.gov/wisconsin-school-meals-rock/school-nutrition-professionals/school-nutrition-outreach-toolkit) provides resources and tools for school nutrition professionals to effectively promote their school nutrition programs and showcase why Wisconsin school meals rock (<https://dpi.wi.gov/wisconsin-school-meals-rock/school-nutrition-professionals/school-nutrition-outreach-toolkit>). This web-based toolkit contains a number of handouts that can be customized to fit your needs, including school breakfast tools.

Smart Snacks

Foods and beverages sold in schools, including foods sold a la carte, must meet both the general standards and nutrient standards unless the sales qualify for an exemption. Entrees are exempt from the standards on the day of and the day after they are served as part of reimbursable meal. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the Smart Snacks webpage, under the resources heading.

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Buy American

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product. A "Domestic Commodity or Product" is defined as an agricultural commodity or product that is produced or processed in the United States using substantial agricultural commodities that are produced in the United States (products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States).

Tracking Professional Standards Training Hours

Clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A [template tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>) is posted to our Professional Standards webpage.

Special Dietary Needs

- WI State Statute 118.29(1) (e): "Practitioner" means any physician, dentist, optometrist, physician assistant, advanced practice nurse prescriber, or podiatrist licensed in any state. If the documentation to support a dietary accommodation has not been

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signed by one of these practitioners, the school is not required to accommodate the request (unless information about the dietary need is included within the IEP or 504 plan, as mentioned above in Section B.)

- Food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the prototype [Medical Statement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>) for Special Dietary Needs posted on the DPI website.

Verification

- Direct Verification is different than direct certification. Direct Verification is the use of public records as a means to verify children's eligibility for free and reduced price benefits. Direct verification may be conducted with Assistance Program agencies or appropriate officials of Other Source Categorically Eligible Programs to confirm eligibility for free meals.
- The confirming official does not need to review every application, just the sample application chosen to verify.

Nonprofit School Food Service Account: Annual Financial Report (AFR)

- A portion of labor, equipment, purchased services, and other must be allocated to non-program foods. When reviewing the 17-18 SY Annual Financial Report (AFR), the only expenses allocated to non-program foods are food. A portion of purchased services and other expenses must also be allocated to the School Breakfast Program (SBP).
- A portion of labor, equipment, purchased services, and other must be allocated to non-program foods. When reviewing the 17-18 SY Annual Financial Report (AFR), the only expenses allocated to non-program foods are food. A portion of purchased services and other expenses must also be allocated to the School Breakfast Program (SBP).

Civil Rights

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 within five days. You will want to make sure that this is included in the district procedures to ensure compliance.

Summer Food Service Program (SFSP) Outreach

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Herman Neosho Rubicon School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov