

Administrative Review Report

Superior School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/06/2019	05/24/2019
On-Site Review	03/06/2019	06/28/2019
Site Selection Worksheet	03/06/2019	03/22/2019
Entrance Conference	05/21/2019	05/21/2019
Exit Conference	05/23/2019	05/23/2019

Commendations:

Thank you to all staff at Superior School District for the warm welcomes and cooperation during this Administrative Review (AR). All documentation was sent prior to the review in an organized manner, which greatly expedited the AR. Staff were friendly, easy to work with, understood the regulations well, and had great rapport with students. Signage was well displayed around the cafeteria, many of which promoted healthy foods and showed students how to select a reimbursable meal. The Food Service Director is doing an exceptional job managing the district's food service operation. They were timely and responsive with submitting documentation and attentive and cooperative during the onsite review. The service area was brand new, presenting a streamlined and convenient way for students to select a variety of menu options. Students had the ability to choose a number of fresh fruits and vegetables, including fresh pineapple, apples, oranges, bananas, pears, applesauce cups, fresh asparagus, roasted Brussels sprouts, yellow bell peppers, cucumbers, spinach, and so much more! There are also different entrée options daily including chicken, sandwich, pizza, homemade, taco, and grab n' go stations. Superior School District's food service department deserves recognition for their focus on high-quality food and customer service. The district offers National School Lunch Program (NSLP), Universal Free Breakfast, After school Snack Program (ASP), Wisconsin School Day Milk Program (WSDMP), Summer Food Service Program (SFSP), and the Child and Adult Care Food Program At Risk (CACFP). It was truly one of the best school food service operations seen. Thank you for serving nutritious meals to the students of Superior School District!

Technical Assistance:

Production Records:

Production record templates for breakfast and lunch as well as production record requirements can be found on our [Production Records webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Crediting Documentation

There is a difference between product specification sheets and product formulation statements (PFS). A product specification sheet identifies specifics of the product such as product code, case weight, and packing information. A PFS is crediting documentation that shows exactly how a product contributes to the meal pattern with entries from the Food Buying Guide (FBG). A PFS is required for processed products not listed in the FBG that do not have a Child Nutrition (CN label).

Rice Krispie Treats, Breakfast

Rice Krispies Treats were the breakfast entrée during the day of onsite review. While these are similar to cereal bars, they are typically considered to be treats or desserts and are not encouraged as a breakfast entrée. Consider serving something else such as plain Rice Krispies or a different grain item more suitable as a breakfast entrée.

Smart Snacks, Overview

Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. For general standards, entrees, snacks, and sides must be a whole grain-rich product, have a fruit, vegetable, dairy product, or protein food as the first ingredient, or be a combination food with at least 1/4 cup fruit and/or vegetable. For nutrient standards, there are calorie, sodium, fat, and sugar limits.

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Smart Snacks, Fundraisers

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. Fundraisers are tracked at Superior School District, but it is unclear if these are compliant or non-compliant.

Buy American

Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed by, manufactured by, or packed in, the U.S, but the country of origin is not listed, this product requires additional information from the distributor on where the product is originally from.

Approving Applications

Follow up with households if the number of people listed on the application does not match the number in the household size box, even if the family would receive the benefit either way.

Verification

Reminder that if the household submits information for verification, the frequency(weekly, biweekly, 2x/month, monthly) must stay the same as what the pay stubs shows. Converting it to a different frequencies could impact the eligibility status.

Food Safety

Even though the milk cartons were in crates, TA was provided to the FSD to make sure the milk crates are 6" off of the ground.

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Findings and Corrective Action:

Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	110	
Corrective Action History	<p>Flagged 05/24/2019 12:08 PM</p>	<p>Finding: The SFA's direct certification notification letter does not include all required information which includes the following: explain that the child is eligible for free benefits without further application; free meal benefits extend to all school-aged children in the household; how to notify the SFA of any additional school-aged children in the household not listed on the notification and explain how the household can decline the benefit (7 CFR 245.6).</p> <p>CA: Provide a statement that the School Nutrition Team template letter will be used, https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications, or provide a corrected letter template for direct certification notification to the household.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
Corrective Action History	<p>Flagged 05/24/2019 11:52 AM</p>	<p>Finding: The total revenues and expenditures for the 2017-2018 SY reported on the Annual Financial Report (AFR) did not match the PI-1505 audited report.</p> <p>CA: Submit an explanation for the difference and on how the SFA will match the two reports moving forward.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	702	
Corrective Action History	<p>Flagged 06/03/2019 03:19 PM</p>	<p>Finding: During the onsite review, it was mentioned that the SFA sent the unpaid meal balances to collections during the review period (2017-2018 SY). Collections was able to recover some of the money, which should have gone back into Fund 50. The remaining unpaid meal balances were considered bad debt or delinquent debt.</p> <p>CA: Submit an explanation on whether these funds were written off as bad or delinquent debt. If it was considered delinquent debt, explain if the SFA is still trying to collect on it. If it was written off as bad debt, upload a copy of the general ledger to show the fund transfer into Fund 50 from another fund.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
Corrective Action History	<p>Flagged 05/24/2019 12:00 PM</p>	<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.</p>

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		<p>CA 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year. The tool can be found at https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial.</p> <p>CA 2: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.</p>
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	136	
Corrective Action History	<p>Flagged 05/28/2019 11:55 AM</p>	<p>Finding: SFA did not have a "Sharing of Information" form on file for fee waivers outside of the Food Service Program, https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications.</p> <p>CA: Upload a copy of the Sharing of Information form that the SFA will use for the 2019-2020 SY.</p>
Form Name	Verification (207 - 215)	
Question #	211	
Corrective Action History	<p>Flagged 05/23/2019 04:26 PM</p>	<p>Finding: The verification notification letter did not contain all required information.</p> <p>CA: Review the Household Notification of Selection section of the Eligibility Manual (pg 105-106) and submit a statement that the DPI template letter will be used moving forward, or upload an updated version of the SFAs verification notification letter into SNACS for approval.</p>
Form Name	Verification (207 - 215)	
Question #	213	
Corrective Action History	<p>Flagged 05/23/2019 04:27 PM</p>	<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.</p>
Form Name	Civil Rights (809 - 810)	
Question #	810	
Corrective Action History	<p>Flagged 05/24/2019 12:12 PM</p>	<p>Finding: The full nondiscrimination statement was not used on program materials being sent to households. The shortened statement is only allowed on the menus and meal balance sheets.</p>

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		CA: Submit a statement of understanding that all program materials being sent to households must have the full nondiscrimination statement on it. Upload the D.C. & application notification template that the SFA will use for the 2019-2020 SY with the full nondiscrimination statement on it.
Site Name	Four Corners El	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
Corrective Action History	Flagged 05/21/2019 02:35 PM	<p>Finding: There was a weekly bean/pea/legume shortage during the lunch week of review at Four Corners Elementary. The Taco Fiesta Beans do not credit cup-for-cup as corn is also present. Instead, the beans credit 1/2 cup = 1/4 cup starchy, 1/4 cup beans/peas/legumes.</p> <p>CA: State what will be done to the week of review so that at least 1/2 cup of vegetables from the beans/peas/legumes subgroup are offered. Include the specific vegetable(s), their quantity, and on what day(s) of the week it will be offered.</p>
Site Name	Superior Hi	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1105	
Corrective Action History	Flagged 05/22/2019 03:39 PM	<p>Finding: The Welch's Fruit Snacks sold at Superior High School are non-compliant with Smart Snacks standards. Sugar exceeds 35% by weight of product.</p> <p>CA: Submit a statement explaining what will be done to discontinue this product including a time frame for when this will go into effect. Include a replacement product that meets Smart Snacks standards, if applicable.</p>
Site Name	Superior Hi	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1106	
Corrective Action History	Flagged 05/22/2019 03:44 PM	<p>Finding: Although Superior School District tracks fundraisers, it is unclear if these meet Smart Snack standards and if student organizations abide by the WI exempt fundraiser limits.</p> <p>CA: Submit a statement explaining how the fundraiser tracking tool will clearly define compliant and non-compliant fundraisers, or submit an updated tracking form with these fundraiser categories separated. Please also submit a statement explaining WI DPI's exempt fundraiser limit.</p>
Site Name	Four Corners El	
Form Name	Wisconsin School Day Milk Program	
Question #	1	

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Corrective Action History	Flagged 05/21/2019 12:55 PM	<p>Finding: SFA used a back out system. Students were checked off prior to taking a milk. The student list was given to the food service staff before or after students took a milk. Staff were prepping meals as students would come through and take a milk but no one was double checking the sheets.</p> <p>CA: Submit a detailed plan on how the SFA will clean up the point of service for WSDMP. Corrected on Site. No further action required.</p>
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