

Administrative Review Report

Altoona School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/04/2022	11/30/2022
On-Site Review	12/06/2022	12/07/2022
Site Selection Worksheet	11/04/2022	11/25/2022
Entrance Conference	12/06/2022	12/06/2022
Exit Conference	12/07/2022	12/07/2022

Commendations:

Thank you to the Food Service Director and food service staff at Altoona Elementary school for their cooperation, enthusiasm, and hard work. The organized menu documentation for the week of review, along with proficient phone conversations, aided DPI in conducting a smooth and efficient administrative review. During onsite review DPI staff noticed a positive meal service operation, including the food service staff greeting students by first names and working cohesively as a team, which contributed to an overall pleasant dining experience.

Recommendations:

As the food service department works through the cycle menu provided by Taher, we recommend confirming that products and practices accurate to the actual operation are noted in the standardized recipes. The conversations regarding the Sloppy Joe on WG Bun recipe inconsistencies were resolved on site but was indicative that additional discrepancies may appear in other recipes made from scratch due to Altoona School District receiving food from Indianhead Food Distribution. Taher bases their menu off of Performance Food Group products, which is Taher's preferred food distributor.

Administrative Review Report

Altoona School District

Findings and Corrective Action:

Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	101	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/06/2022 08:38 PM	Finding: Online contract does not match DO named in offsite questionnaire. CA: Update online contract to correct officials.
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 12/13/2022 03:53 PM	Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). 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.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	807	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/13/2022 03:58 PM	Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31. CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

Administrative Review Report

Altoona School District

Corrective Action History	Flagged 12/13/2022 02:22 PM	<p>Finding: The SFA does not have a Local Wellness Policy (LWP) in place (7 CFR 210.31).</p> <p>CA: Provide a detailed timeline for when the Local Wellness Policy will implemented (include creation of committee, written policy, Board Approval if required, and publicly posting). 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	Flagged	
Corrective Action History	Flagged 12/12/2022 03:45 PM	<p>355 free and reduced-price meal application determinations were reviewed, 6 errors were identified.</p> <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 each household correction letter into SNACS.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	128	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/12/2022 03:49 PM	<p>Finding: The correct income conversion factors were not used when determining meal eligibility on free and reduced-price meal applications. Applications with one income frequency were annualized.</p> <p>CA: Confirm with POS provider how online applications are determined. DO must ensure Skyward determinations are correct and calculated on the income/frequency as listed on application. Only 2 or more frequencies must be annualized. Review the Income Conversions section of the Eligibility Manual (pg 61-62). Submit a statement of understanding on the role of the DO with online applications and submit a statement of understanding on use of correct income conversion factors to use when determining eligibility on a free or reduced-price meal application.</p>
Site Name		
Form Name	Verification (207 - 215)	

Administrative Review Report

Altoona School District

Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/12/2022 03:54 PM</p>	<p>Finding: SFA did not complete a confirmation review before verifying application(s). 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>
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	<p>Flagged 12/13/2022 01:53 PM</p>	<p>Finding: The correct non-discrimination statement was not included on all program materials (household letter for approval/denial of applications, DC letter, verification letter and NDS listed within unpaid meal charge policy). CA: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
Site Name	Altoona Elementary School	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/06/2022 01:47 PM</p>	<p>Finding: Although no non-reimbursable meals were observed during 12/6, many students were made to take more than what they needed at lunch. Food servers were advising students to take a milk with the cold alternative meal (honey mustard wrap, carrots, applesauce) which was already a reimbursable meal containing four full components. In addition, cashiers/POS staff were advising students to take an additional half cup of fruit or vegetable when they already met the requirements to build a reimbursable meal. Corrective Action: Have staff responsible for determining reimbursable meals 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>
Site Name	Altoona Elementary School	

Administrative Review Report

Altoona School District

Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1407	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/13/2022 03:45 PM	Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site specific SOPs #10 (recording temperatures of all equipment daily). CA: Review the SOP with staff and submit a statement describing how practices will be adjusted to be compliant with the established SOP.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
12/13/2022	2579		Administrative Review		Authorized Representative			

Comments

Reporting and Recordkeeping Reporting

- SFAs participating in USDA School Nutrition Programs agree to submit claims for reimbursements, submit program applications and submit reports each year within the required timeframes.
- The Reporting Requirements In a Nutshell provides information regarding reporting and timeframes. Recordkeeping
- All program records related to the school nutrition programs must be kept for a period of three years after submission of the final claim for reimbursement for the fiscal year. If audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit issues. Refer to 7 CFR 210.23 (c) and 7 CFR 210.15 (b). This includes free, reduced-price, and denied applications, DC documents, and verification documents. Other examples of program records that must be kept for three years plus the current year are:
 - o Claims for Reimbursement (including supporting documentation, such as point-of-service benefit issuance rosters);
 - o Meal count participation data by school;
 - o Documentation of edit checks, on-site reviews, internal controls, October enrollment, free and reduced price eligible data;
 - o If applicable, currently approved and denied certification documentation for free and reduced price lunches and a description of the verification activities,
 - o Records to demonstrate the school food authority's compliance with the professional standards for school nutrition program directors, managers and personnel established
 - o Agreements and free and reduced price policy statements;
 - o Approved and denied free and reduced price meal applications;
 - o Procedures and documentation for direct certification for free meals, if applicable;
 - o Procedures for alternate point-of-service meal counts, if applicable;
 - o Menu and food production records and, if applicable, nutrient analysis records;
 - o All documentation provided in support of the Resource Management Section (including appropriate records to document compliance with the paid lunch equity and revenue from nonprogram foods requirements);
 - o Documentation associated with the local school wellness policy;
 - o Number of food safety inspections obtained per school year by each school;
 - o Records from the food safety program for a period of 6 months following a month's temperature records. If temperature records are on production records, then keep for 3 years plus current year
 - o Records from the most recent food safety inspection;
 - o Documents demonstrating compliance with Civil Rights requirements;

Administrative Review Report

Altoona School District

o Audit reports and written responses and any related corrective action.

12/13/2022 4:09:44 PM

12/13/2022	2578		Administrative Review		Authorized Representative			
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Comments

LWP Triennial Assessment

- SFAs are required to complete an assessment of their local wellness policy (LWP) at least once every three years per 7 CFR 210.31(e)(2)).
- The SFA's first triennial assessment must be completed by June 30, 2020.
- The assessment must measure LWP compliance, goal and outcome progress, and how the policy compares to the model policy.
- FNS recommends the WellSAT Tool as a resource to conduct the LWP triennial assessment.
- Assessment results and findings must be released to the public as a written report. There is no required template for this report.

12/13/2022 4:05:48 PM

12/13/2022	2577		Administrative Review		Authorized Representative			
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Comments

Civil Rights Self-Compliance Form (PI-1441)

- The Civil Rights Self-Evaluation Compliance form must be completed by October 31 annually. This is kept on file at the SFA until requested by DPI.

12/13/2022 4:01:03 PM

12/13/2022	2576	805	Administrative Review	ALL	FSD			
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Comments

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: 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. This will be a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner
- 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

Administrative Review Report

Altoona School District

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. As a best practice, statements should be updated/reviewed annually.

12/13/2022 3:57:47 PM

12/13/2022	2575		Administrative Review		Authorized Representative			
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Comments

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.

- Spanish and Hmong versions are also available.

12/13/2022 3:52:35 PM

12/13/2022	2574		Administrative Review		Authorized Representative			
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Comments

On-site Monitoring

- Every school year, SFAs with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP.

- Monitoring is due by February 1.

- The NSLP On-Site Monitoring Form and the SBP On-Site Monitoring Form forms are on the Onsite Monitoring section of the DPI SNT website.

12/13/2022 3:41:07 PM

12/13/2022	2571		Administrative Review		Authorized Representative			
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Comments

LWP Requirements

- The LWP requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires SFAs to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

- SFAs are required to retain basic records demonstrating compliance with LWP requirements.

- If no LWP has been developed, the SFA must establish a written policy.

- For assistance in the creation of a LWP, Wisconsin Team Nutrition has several wellness policy resources available. A toolkit, a wellness policy builder, and wellness policy report card found on the Local Wellness Policy (LWP) webpage.

- SFAs are required to have language in their LWP that relates to all the content areas listed in the LWP Checklist found on the Local Wellness Policy section of the DPI SNT website.

12/13/2022 2:24:45 PM

12/13/2022	2570		Administrative Review		FSD			
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Administrative Review Report

Altoona School District

Comments

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.
- If a private or Choice school is using the 2015 NDS and/or 2019 And Justice For All Poster, ask, "does religious exemption apply?" If the answer is yes, no further action is needed. If the answer is no, CA to use the 2022 NDS and/or poster will apply.
- If a public or Charter school does not wish to use the 2022 NDS and AJFA poster due to content, CA would apply with the statement "the religious exemption does not apply to public schools. You should contact your school district legal team for further information."

12/13/2022 1:55:05 PM

12/13/2022	2568		Administrative Review	FSD			
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Comments

Verification

- When an application(s) is chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications selected [7 CFR 245.6a(e)(2)]. Applications may be replaced when the LEA believes the household would be unable to satisfactorily respond to the verification request. This action should be documented.
- When a household is selected for verification, the LEA must inform the household, in writing, of its selection and must provide a list of the documents or other forms of evidence the household must submit to the LEA. DPI has created a We MUST CHECK your application sample letter for verification purposes with required documentation included.
- When a household is selected for verification, it must provide "sources of information" to the LEA to confirm current income or participation in a categorically eligible program. According to 7 CFR 245.6a(a)(7), sources of information may include written evidence, collateral contacts, and systems of records.
- Acceptable documentation of income or receipt of assistance from any of the following sources may be provided for any point in time between the months prior to application and the time the household is required to provide the documentation.
- Households may provide pay stubs with income from employment. If a weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient. If the household submits a pay stub including overtime, the determining official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income without overtime.
- Section 9(b)(3)(F) of the NSLA and Program regulations at 7 CFR 245.6a(g) permit LEAs to "directly" verify approved applications selected for verification. Direct verification involves using records from public agencies to verify household income or household participation in an eligible program, helping relieve families of additional paperwork and reducing the gap in meal benefits for eligible children resulting from non-response. LEAs are not required to conduct direct verification.
- The LEA must make at least one attempt to contact the household when the household does not respond to the request for verification [7 CFR 245.6a(f)(6)]. "Non-response" includes no response and incomplete or ambiguous responses that do not permit the LEA to resolve children's eligibility for free and reduced-price meals. The required follow-up attempt may be in writing (mail or e-mail) or by telephone or text message.
- When a benefit eligibility status increases, the change must take place within three days. When benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with

Administrative Review Report

Altoona School District

appeal rights procedures. DPI has created a We HAVE CHECKED your application letter template for LEAs to use after verification is completed.

12/13/2022 1:43:38 PM

12/07/2022	2540	603	Administrative Review	Altoona Elementary School				
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Comments

A **variety of milk** is required to be offered daily at lunch and breakfast. Within the week of review documentation, the printed lunch menu did not list a milk variety, although it was indicated on the production records. Thank you to the Food Service Director for correcting this oversight. During the onsite observation it was confirmed that December's printed lunch menu listed an accurate milk variety.

12/7/2022 9:08:04 AM

12/06/2022	2539	407	Administrative Review	Altoona Elementary School				
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Comments

Recipes should be updated to reflect current practices and products. Standardized recipes exist, but during observation it was noted that the Sloppy Joe on WG Bun recipe did not accurately reflect what is happening in the kitchen. Beef crumbles were substituted for ground beef in the original recipe and a 4 oz. spoodle was used instead of a #10 scoop. The original recipe was also indicating a serving size of 3.2 fl. ounces, which is a measurement of volume. Thank you for accurately updating this recipe to show a portion size of 3/8 cup while DPI staff was onsite.

12/7/2022 8:55:31 AM