

Administrative Review Report

Lancaster Community School District - 222912

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/24/2019	03/14/2019
On-Site Review	04/09/2019	04/11/2019
Site Selection Worksheet	01/24/2019	02/08/2019
Entrance Conference	04/09/2019	04/09/2019
Exit Conference	04/11/2019	04/11/2019

Commendations:

Thank you to the staff at Lancaster Community School District for the courtesies extended during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

Thank you to the food service director for the communication before the on-site review. The great organization helped expedite the review process and also allowed more time for on-site technical assistance. The food service director runs exemplary NSLP and SBP programs, and has excellent working knowledge of the meal pattern, crediting documentation, and offer versus serve. It is evident that the director is clear and concise in staff trainings, as all food service workers and cafeteria aides executed their roles flawlessly during meal service.

The food presentation had great meal appeal and ample signage was visible throughout the service line. The staff at Winskill Elementary created signage for the students at breakfast to more clearly explain the breakfast meal pattern and offer versus serve rules by giving each food item a point value. The students did not struggle in creating their own reimbursable meals thanks to the signage and consistent communication by food service staff.

The elementary secretary, administrative assistant, and business manager were all very helpful and knowledgeable. These staff members were quick to implement suggested changes and worked hard to pull requested documents.

All school staff members involved in the review process were very friendly and clearly dedicated to the students and the child nutrition programs. The district will be implementing the Summer Food Service Program for the first time this upcoming summer--great job adding a program to meet the needs of the students and community!

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Findings and Corrective Action:

Site Name	District-wide	
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	103	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/19/2019 07:57 AM</p>	<p>Finding: The SFA provides a fee waiver incentive to all households that complete a free/reduced meal application. Under USDA regulations, the meal application may only be used for determining free and reduced priced benefits for children participating in the school nutrition programs. Completing an application for free or reduced priced meals is completely at the discretion of the household and schools may not require or offer financial incentives to complete the application.</p> <p>CA: Please submit a detailed statement indicating the steps the district intends to take to immediately discontinue the practice of providing fee discounts in exchange for completed meal applications.</p>
Site Name	District-wide	
Form Name	Verification (200 - 204)	
Question #	201	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/19/2019 07:55 AM</p>	<p>Finding: The determining (DO), confirming (CO), and verifying (VO) officials listed on the online contract for 2018-19 do not reflect the staff members that actually perform the respective duties. Please reference the Eligibility Manual and DPI Verification webcast for details regarding the duties of each designated official (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf; https://dpi.wi.gov/school-nutrition/training/webcasts#verif). Currently in the SFA, the determining official responsibilities are shared among the three building secretaries. The verifying official responsibilities are held by the administrative assistant, and it is unclear who holds confirming official duties.</p> <p>CA: Submit a statement that describes which staff members will be designated as each official for the next school year. Please include names and position titles of the officials. These officials will also need to be designated accurately on the</p>

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	2019-20 online contract. See technical assistance section for recommendations regarding official designation.	
Site Name	District-wide	
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/22/2019 09:28 AM</p>	<p>Finding: The current point of service (POS) system for field trip meals does not meet POS requirements. Currently, student accounts are charged for field trip meals when the meals are taken from the cafeteria for the field trip according to which students ordered a meal. This is not acceptable because the students are counted and charged before they actually take their meal at the point where it can be confirmed that an eligible student received their reimbursable meal.</p> <p>CA: Modify the POS for field trip meals so that students are checked off by the accompanying teacher as they take their meal. Completed check off sheets should be returned to food service and used for charging student accounts and claim submission. Submit a written plan detailing how field trip meals will be counted and claimed going forward, including a copy of the check off sheet that will be used at the POS. Please reference the Field Trip Meals section of the NSLP Menu Planning webpage for templates and resources (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).</p>
Site Name	District-wide	
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/22/2019 10:12 AM</p>	<p>Finding: The SFA offers non-reimbursable alternate meals free of charge to students with negative balances that exceed the district's established allowable negative balance threshold. Because these meals are prepared with food service funds but are not charged to households or claimed for reimbursement, these meals must be funded from a non-federal source. Fund 50 may not absorb the cost of providing these meals free of charge. There is currently no tracking system in place for these meals, thus a fund transfer has not been made to cover these costs.</p> <p>CA: Develop and implement an SFA-wide plan for tracking</p>

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		these meals. At the end of each month or year, the tracking sheets must be used to calculate and execute a transfer from a non-federal fund to Fund 50 to cover the costs of these meals. Submit a detailed description of the tracking process, including a copy of the tracking tool that will be used -- if applicable.
Site Name	District-wide	
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/22/2019 10:49 AM	<p>Finding: The SFA completed the USDA Non-Program Foods Revenue tool for 2017-18 using Annual Financial Report (AFR) data. While the correct values were entered in the tool from the AFR, some incorrect AFR allocations may have caused an inaccurate assessment in the tool. For this reason, it could not be accurately determined if non-program food revenue requirements were met.</p> <p>CA: Complete the DPI Non-Program Food Revenue tool using data from the 2018-19 school year (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx). District-wide data from a reference period of at least five consecutive school days should be used. Upload the completed tool into SNACS. After tool completion and submission, the SFA and consultant must collaborate on any suggested changes to non-program food procedures and pricing to ensure compliance. See technical assistance section of the report for more information and resources.</p>
Site Name	District-wide	
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	710	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/17/2019 10:10 AM	<p>Finding: Adult lunch prices were not high enough to comply with FNS Instruction 782-5 Rev. 1. The online contract showed that the minimum required price of \$3.65 was being charged for an adult lunch. However, in practice adults were being charged \$3.60.</p> <p>CA: Utilizing the <i>Wisconsin Adult Meal Pricing Guide</i> on the Financial Management webpage on the SNT website, determine the minimum price required for adult meals at the SFA (<a 885="" 974="" 976="" 987"="" data-label="Page-Footer" href="https://dpi.wi.gov/school-nutrition/national-school-</p> </td> </tr> </table> </div> <div data-bbox=">Page: 4 of 22</p>

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		lunch-program/financial). Notify SFA staff and adult customers of the price increase. Update prices by the corrective action due date. Upload the calculations used to determine the adult meal price, a copy of the communication sent to staff/adults, and a screenshot of the new adult lunch price programmed in the POS into SNACS. The business manager took necessary steps to correct the adult lunch price during the on-site review. <i>No further action required.</i>
Site Name	District-wide	
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/22/2019 11:05 AM	<p>Finding: The current LWP does not include all of the required content. Content regarding public involvement, foods sold outside school meals programs, food and beverage marketing, nutrition promotion, the triennial assessment, and updating/informing the public is missing or lacking the necessary information. Please reference the DPI Wellness Policy webpage (particularly the Local Wellness Policy Checklist) and the technical assistance sections of this report for more information (https://dpi.wi.gov/school-nutrition/wellness-policy).</p> <p>CA: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Site Name	District-wide	
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/27/2019 10:07 AM	<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). This is required even if the SFA does not offer the 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. For outreach materials and information, please visit the SFSP Outreach webpage (https://dpi.wi.gov/community-nutrition/sfsp/outreach).</p>

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Site Name	District-wide	
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/22/2019 11:15 AM</p>	<p>Finding: Of the 241 eligibility statuses reviewed, 14 errors were identified. The errors included the following: blank household members box on part G of applications, missing SSN information on part H of applications, conflicting numbers of household members' names and number of members reported in household members box in part G of applications, no documentation on file to support benefits given, and reported income skipped in determination calculation. These errors are used to calculate and error percentage and some may be subject to fiscal action.</p> <p>CA: During the on-site review, the appropriate officials contacted households to gather/clarify application information. Additionally, households without documentation on file or incorrect determinations were sent appropriate notification letters advising of benefit changes. <i>No further action required.</i></p>
Site Name	District-wide	
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	129	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/19/2019 07:37 AM</p>	<p>Finding: The application approval/denial letter generated by the software system and sent to households contains the incorrect non-discrimination statement. Visit the DPI Civil Rights website for the full, updated version of the statement that must be included on all household communications pertaining to the child nutrition programs (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights). Please note that the formatting of the statement (i.e. spacing) cannot be modified in any way and the font size must be the same size as the majority of the document. The statement may not be shrunk in size or reformatted to save pages or space on the final document.</p> <p>CA: Update the template application approval/denial letters with the correct, full non-discrimination statement and upload the new versions into SNACS.</p>

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Site Name	District-wide	
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	133	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/22/2019 11:37 AM</p>	<p>Finding: One benefit issuance error outside of the review sample was noted. One student was approved for free benefits via income application early on in the school year. This student later matched as a Z code for reduced benefits on direct certification (DC). The SFA incorrectly replaced the free benefit by application with the reduced benefit from DC. Student must always receive the best benefit for which they are eligible, therefore the student should have received free meals all year. This error does not count towards the benefit issuance error percentage and is not subject to fiscal action.</p> <p>CA: While on-site, the determining official at Winskill changed the student's benefit to free and sent a letter to the household regarding the change. See technical assistance section for information regarding refunding the household. <i>No further action required.</i></p>
Site Name	District-wide	
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/19/2019 08:02 AM</p>	<p>Finding: The SFA did not complete a confirmation review before verifying applications. The tracking sheets used for verification had dates listed on the confirmation review line, however there was no indication of who conducted the review and the applications did not contain confirming official signatures or confirmation review dates.</p> <p>CA: Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be completed by the confirming official for the selected applications before the verifying official reaches out to households selected for verification (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf). Please also describe how the confirmation review will be documented.</p>
Site Name	District-wide	
Form Name	Verification (207 - 215)	
Question #	209	

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TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/19/2019 07:29 AM</p>	<p>Finding: The SFA incorrectly over-verified by selecting four applications to verify instead of the required three. Additionally, one household that was selected for verification due to an application on file as of 10/1/18 matched free on direct certification on 10/8/18. The household was contacted for verification multiple times but failed to respond. The household was changed to paid/normal following the non-response, despite their valid free DC benefit. The student was changed back to free after a DC run on 12/5/18. This student should have been free for the entire school year and should never have experienced a lapse in benefits.</p> <p>CA: Submit a statement detailing how such verification errors will be avoided in the future. Please be specific and address how the correct number of applications will be verified without over- or under-verification. See technical assistance section for information regarding refunding the household.</p>
Site Name	District-wide	
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/22/2019 09:57 AM</p>	<p>Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive and track job-specific training in the current school year (7 CFR 210.30). The three building secretaries are responsible for free/reduced benefit management, the business manager is responsible financial management and claiming, and the administrative assistant is responsible for verification and direct certification. This qualifies the five staff members as "non-school nutrition program staff with job duties pertaining to school nutrition programs" and thus four hours of professional standards training annually are required (including civil rights training).</p> <p>CA: Submit a plan for how training requirements for these staff members will be met going forward. Please be specific regarding who will track these completed training hours and what types of trainings may be completed. See technical assistance section for additional information and resources.</p>
Site Name	District-wide	
Form Name	Food Safety & Buy American (1400 - 1403)	

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Question #	1400	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/19/2019 09:44 AM</p>	<p>Finding: Reimbursable field trip meals are offered at Winskill Elementary, however there was not a corresponding standard operating procedure (SOP) in school's food safety plan. The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).</p> <p>CA: Develop and submit an SOP for field trip meals to reflect site-specific procedures for field trip meals. A template field trip SOP which can be modified to be site-specific is available on the food safety webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fieldtrip_may2014.docx). The SOP should be added to the food safety plan at any schools where field trip meals are offered.</p>
Site Name	Winskill El	
Form Name	Special Milk Program	
Question #	4	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/19/2019 08:55 AM</p>	<p>Finding: The SFA retains claims and cover sheets of roster totals for the Special Milk Program (SMP) and WI School Day Milk Program (WSDMP). However the monthly check off rosters used by teachers in each classroom are not retained. The original monthly check off sheets from the individual classrooms serve as point of service (POS) documentation and must be retained in accordance with records retention regulations. This information must be retained for three years plus the current year.</p> <p>CA: Begin retaining all original check off sheets from both milk programs. Submit a statement describing how records retention requirements will be met for milk program POS documentation going forward.</p>
Site Name	Winskill El	
Form Name	Special Milk Program	
Question #	5	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 04/22/2019 08:29 AM	<p>Finding: Conversations with food service staff at Winskill and 4K teachers indicated that there are some students that have been allowed to participate in the Special Milk Program (SMP) and NSLP and/or SBP daily. Per the teachers, one student has been allowed to participate and be claimed in both SMP and NSLP and one other student was allowed to participate and be claimed in both SMP and SBP. Dual participation in SMP and NSLP and/or SBP is not allowable. Fiscal action will be calculated to reclaim funds paid for these students that dually participated in the programs.</p> <p>CA: This violation is a repeat violation from the prior review. During the current review, there was no system or process established to avoid double-claiming students in SMP and NSLP and/or SBP. For this reason, all milks claimed for the few 4K students with access to SMP and NLSP/SBP during 2018-19 will be subject to fiscal action and reclaimed as necessary. Please note that all milks served to these few students in SMP will be reclaimed due to the repeat nature of this finding--not just the milks served on days the students were double-claimed. Immediately discontinue double-claiming students in SMP and NSLP/SBP. The milks served to these students with dual program participation cannot be claimed under SMP and must be paid for with non-federal funds. Submit counts from the date the double-claiming is discontinued back to the beginning of the school year to show how many milks were claimed in SMP for the few 4K students with access to SMP and NSLP/SBP. Also submit a statement describing how this double claiming will be prevented going forward—be specific about the counting and claiming procedures that will occur.</p>
	<p>Site Name Winskill EI</p> <p>Form Name Special Milk Program</p> <p>Question # 6</p> <p>TA Log # No TA Log# found</p> <p>Corrective Action Status Flagged</p>	
Corrective Action History	Flagged 04/19/2019 08:48 AM	<p>Finding: The SFA offers several milk types in the Special Milk Program (SMP) for the half day 4K students, including chocolate milk. The Child and Adult Care Food Program (CACFP) meal pattern that applies to infants and children up to age five and not yet in kindergarten was updated 10/1/17 (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool). This CACFP meal pattern applies to the 4K students and covers school nutrition programs including breakfast, lunch, SMP, and afterschool snack. The CACFP meal pattern does not permit flavored milk to be served to children five years old and younger and not yet in kindergarten. Please reference the Milk Programs Comparison Chart for more information</p>

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		(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smp-wsdmp-comparison-chart.pdf). CA: Submit a statement describing how the CACFP meal pattern guidelines will be met in SMP in the next school year.
Site Name	Winskill El	
Form Name	Special Milk Program	
Question #	7	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/19/2019 09:08 AM	Finding: Milks for "milk break" (i.e. SMP and WSDMP) are stored in two coolers in the hallways at the elementary school. The coolers are equipped with thermometers and have signage to ensure they are opened minimally, but temperature monitoring is not occurring by food service staff or any other building staff members. Daily temperature monitoring and recording is needed for these two coolers to ensure they are consistently holding milk at safe temperatures and so any corrective action needed for unsafe holding temperatures can be made promptly and documented. CA: Submit a statement describing who (name and position title) will be responsible for monitoring and recording these milk cooler temperatures daily. Please specifically describe how the temperatures will be monitored by the designated person. It is also highly recommended to develop a cleaning schedule for the coolers and designate a person to oversee the regular cleaning.
Site Name	Winskill El	
Form Name	Wisconsin School Day Milk Program	
Question #	1	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/08/2019 12:40 PM	Finding: The Wisconsin School Day Milk Program agreement on file with DPI is from the 1990's and must be updated to reflect. CA: Complete and submit an updated agreement to the consultant for approval (https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf).
Site Name	Winskill El	

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Form Name	Wisconsin School Day Milk Program	
Question #	4	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/19/2019 08:38 AM	<p>Finding: During observation and discussions about the point of service (POS) for the WSDMP, it was noted that some teachers mark off their milk break rosters based only on which students are signed up for milk break but did NOT take milk. This is not an acceptable POS practice because only those that decline their milk or are absent are marked which relies on the assumption that everyone who is unchecked received their milk. See technical assistance section for additional POS details.</p> <p>CA: Provide a reminder notice to teachers responsible for WSDMP of the POS requirements and expectations. Upload a copy of the information sent to the teachers into SNACS, along with a statement describing how and when it was distributed.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	Comments	Created Date
04/23/2019	619	101	Administrative Review	ALL		
					<p>The role of the determining official is currently divided amongst the three building secretaries. It is highly recommended to re-evaluate and re-structure the current method for processing applications, direct certification, and other benefit certification documents. Having the determining duties divided leaves greater room for error and disperses knowledge of free/reduced qualifying students to more individuals in the district. Errors could potentially be minimized if one person held the sole responsibility for free/reduced benefit determination and issuance. It may be easier to have one person that needs to keep up on training for free/reduced management, rather than needing to train and re-train multiple staff members. The 5.8% error percentage noted during the administrative review of eligibility statuses suggests that a change in procedures may be warranted as a means to reduce errors and streamline the process. Please consider how the roles of the determining official may best be designated and ensure the online contract reflects the name(s) of the staff member(s) holding determining duties.</p>	4/23/2019 9:07:49 AM
04/23/2019	618	133	Administrative Review	ALL		
					<p>There were a total of two households that incorrectly received reduced benefits for some duration during the school year when they should have been receiving free benefits. These households are now receiving the correct benefits but likely paid for some meals that they</p>	4/23/2019 9:06:17 AM

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should have received for free. The district may choose to, but is not required to, refund these households for meals they were incorrectly charged for. This refund could not come from Fund 50 unless all claims were adjusted to claim these student's meals as free, which would be a time-consuming process for all parties involved. If pursued, the refund would need to be given from a non-federal fund if claims will not be adjusted.				
04/23/2019	617	709	Administrative Review	ALL
Comments				
				Created Date
<p>All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus, non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit. Non-program food costs and revenues must be separated from program food costs and revenue—this includes separating adult meals and extra milk from program foods. Additionally, the non-program foods revenue tool must be completed at least annually to determine compliance with USDA requirements for revenue. Please reference the following when completing the tool:</p> <ul style="list-style-type: none"> • Non-Program Foods Revenue Rule SP-20-2016 (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) • Non-Program Foods In a "Nutshell" (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) • Non-Program Food Revenue webcast (https://dpi.wi.gov/school-nutrition/training/webcasts#nfr) • Non-Program Food Revenue section of Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) 				4/23/2019 9:01:59 AM
04/23/2019	616	4	Administrative Review	Winskill EI
Comments				
				Created Date
<p>Counts used for reimbursement claims (including for WSDMP) must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal. Using morning attendance, milk counts taken prior to service (including pre-checking students on the roster for the day, week, or month) and counting based on the number students that do not take milk are not acceptable. In these methods, there is room for error if students order but do not take their milk, leave school before service time, or other such discrepancies. Please reference the WSDMP FAQ (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf).</p>				4/23/2019 8:59:29 AM
04/23/2019	615	201	Administrative Review	ALL
Comments				
				Created Date

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<p>There was confusion over the roles of the various officials in the free/reduced application and verification process. The determining official is responsible for processing submitted applications and determining the benefit the household is eligible for. Before verification activities can begin, a designated confirming official must review each approved application selected for verification to confirm that the initial benefit determination was accurate. The confirming official does not need to double check all applications processed by the determining official—just those selected for verification. After the confirming official confirms the initial determination on the selected applications, then the verifying official may begin the verification process by contacting the household to request supporting documentation. If the confirming official disagrees with the initial determination, then specific procedures must be followed to proceed with verification. All officials must sign and date the application when their duties in the process are complete. Please reference pages 103-104 of the Eligibility Manual for additional information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).</p>					4/23/2019 8:56:56 AM
04/23/2019	614	209	Administrative Review	ALL	
Comments					
				Created Date	
<p>If an application was picked from the verification pool as of October 1 and the household was found on a direct certification (DC) run after that time, this application is counted as "verified" and can be recorded as such without further action from the household. The SFA must notify the household they keep their benefit (or are eligible for an increased benefit), and indicate that they were found on DC or attach a DC approval letter.</p>					4/23/2019 8:56:08 AM
04/23/2019	613	314	Administrative Review	ALL	
Comments					
				Created Date	
<p>The SFA indicated that there are plans to switch to full-day 4K in the next school year. If 4K students will begin having access to breakfast and/or lunch on the days they attend school, there are some meal pattern and claiming considerations. Please reference the Infants and Preschool in NSLP and SBP webpage for meal pattern information, including a training presentation, Q & A, and contact information for DPI specialists on this topic (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool). For information regarding claiming 4K students, please reference Appendix A of the claiming manual (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/site-based-claiming-manual-accessible-version.pdf).</p>					4/23/2019 8:51:44 AM
04/23/2019	612	1000	Administrative Review	ALL	
Comments					
				Created Date	
<p>The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. For assistance in the creation and/or modification of a LWP, SFAs are encouraged to utilize the Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit (https://dpi.wi.gov/school-nutrition/wellness-policy). At a</p>					4/23/2019 8:49:36 AM

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minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

SFAs must review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. This recommended annual review of the policy is separate from the required triennial assessment.

SFAs must assess the LWP every three years, at a minimum--this is referred to as the "triennial assessment." The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. It must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results and when it took place.

After completion of the triennial assessment, SFAs are required to inform and update the public about the results. SFAs must retain a copy of the assessment and documentation related to the public notification. The public notification may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Resources:

- Please refer to the [USDA summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- [USDA Food and Nutrition Service](https://healthymeals.nal.usda.gov/school-) has information on the local school wellness policy process and wellness policy elements (<https://healthymeals.nal.usda.gov/school->

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<p>wellness-resources).</p> <ul style="list-style-type: none"> • Wisconsin Team Nutrition has several wellness policy resources available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy). <p>The district's LWP lacks specificity and does not contain well-defined measurable goals throughout the required content areas. Additionally, some of the language is outdated (such as references to the Food Pyramid) and could be updated to reflect current guidelines, regulations, and goals. It is highly recommended that the SFA review the resources mentioned above and critically evaluate the LWP content upon the next update to make it more specific, up-to-date with regulations, and to contain measurable goals the SFA can work towards.</p>				
04/23/2019	611	806	Administrative Review	ALL
Comments				
				Created Date
<p>There are several regular cafeteria aides that are responsible for the final tray-check at the end of the line. These staff members have direct contact with the child nutrition programs and the participating students, and therefore should complete the annual civil rights training. Please begin providing this training to these aides annually and retain documentation that the training was completed for each individual. For a copy of the training presentation, please visit the Civil Rights webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights).</p>				4/23/2019 8:45:44 AM
04/23/2019	610	700	Administrative Review	ALL
Comments				
				Created Date
<p>It appeared that there were some inaccurate allocations on the Annual Financial Report. Please note the general allocation reminders below and ensure allocations are done correctly going forward:</p> <ul style="list-style-type: none"> • Non-program food revenue must include all revenue from the sale of all non-program foods including a la carte items, adult meals, extra milk, milk purchased for milk break, catering, and meals sold to other organizations such as Head Start. • Food expenditures for non-program foods must include all raw food costs for all non-program foods sold, including all the non-program foods listed above. • Labor, equipment, purchased services, and other expenditures must be allocated to all programs to which they apply. Labor allocations should be based on an annual time study. Equipment, purchased services, and other expenditures should be allocated based on actual usage by program. However, these expenditures may be difficult to calculate which is why DPI School Nutrition Team has created a tool to assist with these allocations (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/expense-allocation.xlsx). In addition to this tool, there are other resources on the Financial Management webpage under the heading Annual Food Service Financial Report (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial). 				4/23/2019 8:42:45 AM
04/23/2019	609	705	Administrative Review	ALL

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Comments				
				Created Date
<p>The SFA charges a portion of garbage services to Fund 50 and bases this percentage on an annual 5-day long trash study conducted by the building custodians in the fall. Acceptable (though minimal) documentation regarding this trash study was provided during the review and indicated that the percentage charged to food service was an allowable as a direct cost, since the amount charged was necessary, reasonable, and allocable. Please continue to conduct this annual study. It is highly recommended to maintain more detailed documentation of this trash bag count study, which would preferably kept electronically year to year. This documentation should be retained in accordance with record keeping requirements. The percentage charged annually to food service can and should be adjusted year to year based on the results of the study.</p>				4/23/2019 8:37:01 AM
04/23/2019	608	805	Administrative Review	ALL
Comments				
				Created Date
<p>The SFA's current process for managing special dietary needs is acceptable. It is encouraged to periodically review the resources on the Special Dietary Needs webpage to ensure continued compliance with accommodation requirements. Additionally, as described in the USDA-FNS Accommodating Children with Disabilities in the School Meal Programs resource, an SFA may not unduly delay providing a needed modification while awaiting a medical statement (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/accommodating-children-with-disabilities.pdf). The food service director does a good job implementing modifications promptly while working on acquiring the needed documentation.</p>				4/23/2019 8:32:05 AM
04/23/2019	607	1219	Administrative Review	ALL
Comments				
				Created Date
<p>The building secretaries, business manager, and administrative assistant are considered "non-school nutrition program staff with job duties pertaining to school nutrition programs" and thus four hours of professional standards training annually are required for each staff member (including civil rights training). Please reference the Professional Standard Training Requirements chart, as well as the rest of the resources (including template tracking tools) on the Professional Standards webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf; https://dpi.wi.gov/school-nutrition/professional-standards).</p>				4/23/2019 8:24:07 AM
04/23/2019	606	314	Administrative Review	ALL
Comments				
				Created Date
<p>During validation of severe need breakfast (SNB) qualification, it was discovered that the high school qualifies for SNB but was not signed up as such on the online contract for 2018-19. The qualifying information was not entered on the online contract, and thus the high school has been claimed under non-severe need breakfast throughout the school year. Please continue to</p>				4/23/2019 8:15:42 AM

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work with the consultant to begin claiming the high school in SNB and to make the applicable retroactive claim adjustments.				
04/23/2019	605	126	Administrative Review	ALL
Comments				
				Created Date
Of the 241 eligibility statuses reviewed, 14 errors were noted. This calculates out to a 5.8% error percentage, which exceeds the 5% threshold for an independent review of applications (IRA). As a result, the SFA will be required to conduct an IRA during the next school year. A formal letter from the DPI School Nutrition Team in the summer will provide details on this requirement. Please refer to page 51 of the Eligibility Manual for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).				4/23/2019 8:12:22 AM
04/23/2019	604	200	Administrative Review	ALL
Comments				
				Created Date
Because the SFA had a non-response rate of 25% on verification, use of the standard sample will be required in the next school year. A formal letter from the DPI School Nutrition Team will advise on this requirements and details of the required sample size. During years when the SFA is not required to use standard sample, it is recommended to use alternate one sample size as it would be the simplest sample size for the SFA. Please review pages 101-103 of the Eligibility Manual for more details (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).				4/23/2019 8:00:29 AM
04/23/2019	603	138	Administrative Review	ALL
Comments				
				Created Date
There was one student on the March 2019 benefit issuance list that was listed as "withdrawn" in November 2018. Withdrawn students should not be included on benefit issuance lists, as they are not active, enrolled students with meal access. Please investigate this issue and work with the software vendor to ensure withdrawn students are managed correctly.				4/23/2019 7:55:34 AM
04/23/2019	602	209	Administrative Review	ALL
Comments				
				Created Date
Some of the submitted pay stub information during verification was not assessed entirely correctly, however this did not result in any verification errors. It is recommended that the verifying official review the verification with pay stubs information on pages 107-109 of the Eligibility Manual , as well as the DPI verification webcast (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf ;				4/23/2019 7:53:01 AM

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https://dpi.wi.gov/school-nutrition/training/webcasts#verif).				
04/23/2019	601	142	Administrative Review	ALL
Comments				
				Created Date
The SFA has not had any households decline benefits for which they are eligible. However, if a household wished to voluntarily decline their awarded benefit, it is highly recommended to obtain this request in writing and keep it on file. The students' benefit status must be changed in the benefit issuance system on the day the determining official receives the request from the household to decline the benefit.				4/23/2019 7:42:24 AM
04/23/2019	600	134	Administrative Review	ALL
Comments				
				Created Date
Currently, the building secretaries manually enter direct certification (DC) information into the software system upon receipt of the run output file from the administrative assistant. It is highly recommended to work with the software vendor to determine if/how DC runs can be automatically uploaded into the system. Automatic uploads would minimize errors, ensure correct effective dates, streamline the DC process, and reduce work load for updating benefits.				4/23/2019 7:38:21 AM
04/23/2019	599	106	Administrative Review	ALL
Comments				
				Created Date
Prior to the on-site review, only the three building secretaries had access to food service modules in the software system. During the review, the administrative assistant (who conducts verification and direct certification) also obtained access to the food service areas of the software system. This expansion of access may help streamline the benefit issuance process, particularly as it relates to direct certification updates.				4/23/2019 7:35:15 AM
04/23/2019	598	200	Administrative Review	ALL
Comments				
				Created Date
The SFA over-verified applications by verifying four, instead of the required three. As described on page 99 of the Eligibility Manual , "with the exception of verification for cause, LEAs must not verify more or less than the standards sample size or the alternate sample size," (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf). Going forward, please ensure the exact required number of applications are verified--no more and no less (unless utilizing verification for cause as described in the Eligibility Manual).				4/23/2019 7:31:14 AM

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04/22/2019	597	126	Administrative Review	ALL
Comments				
				Created Date
<p>The SFA had numerous free/reduced application errors resulting from incomplete applications being processed without obtaining the missing or unclear information. As a reminder, income applications must list all household members' names which must match the number reported in the box in Step G, and must contain adult SSN information in Step H. Please reference the Eligibility Manual and DPI Free/Reduced webpage for more information and resources to assist in application approval (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf; https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications).</p>				4/22/2019 12:16:38 PM
04/22/2019	596	126	Administrative Review	ALL
Comments				
				Created Date
<p>Any application (app) missing required information, contains inconsistent information, or is unclear is considered incomplete and may not be determined until clarified with the household. The SFA may return the app to the household or contact the parent/guardian by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Reasonable effort should be made to obtain the missing information prior to denying the app.</p>				4/22/2019 12:09:39 PM
04/22/2019	595	133	Administrative Review	ALL
Comments				
				Created Date
<p>Free/reduced eligibility established via direct certification takes precedence over eligibility via application, unless the application establishes a better benefit for the student. Students must always receive the best benefit for which they are eligible. Direct certification cannot override an application if the application establishes a better benefit for the student.</p>				4/22/2019 12:05:07 PM
04/22/2019	594	126	Administrative Review	ALL
Comments				
				Created Date
<p>When a free/reduced application contains a valid case number from an eligible assistance program in Step 2 along with income information, the application should be processed based on the case number information. Case numbers take precedence over income information on applications, and should be recorded as such in the student information system. Students are considered categorically eligible for free meals when valid case numbers from eligible assistance programs are provided on applications.</p>				4/22/2019 12:01:00 PM
04/22/2019	593	208	Administrative Review	ALL

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Comments				
				Created Date
Please note that the space on the back of free/reduced applications for the confirming and verifying official signatures must only be completed if the application is selected for verification. When applications are approved, only the signature of the determining official and approval date must be recorded in this section. A double-check and second signature is not required on all applications unless an Independent Review of Applications is required (as notified by DPI).				4/22/2019 11:56:29 AM
04/22/2019	592	126	Administrative Review	ALL
Comments				
				Created Date
As a reminder, eligibility effective dates are: the date an application is approved, the date of the DC run the student matches on, the date a benefit extension is identified, or the date the determining official is notified by the appropriate school official (e.g. homeless liaison or migrant coordinator) that a student is homeless, migrant, runaway, or enrolled in Head Start. Backdating of eligibility is not allowable.				4/22/2019 11:52:03 AM
04/22/2019	591	710	Administrative Review	ALL
Comments				
				Created Date
Adult meals are considered non-program foods and must be priced at or above the overall cost of the meals. SFAs must, at a minimum, follow the minimum pricing guidelines in Food Nutrition Services Instruction 782-5. A Wisconsin Adult Meal Pricing Worksheet has been developed to assist the SFA in pricing adult meals (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc). Please use the most current reimbursement rates and the adult meal pricing worksheet to ensure correct adult meal prices are established in upcoming school years.				4/22/2019 11:50:15 AM
04/10/2019	472	411	Administrative Review	Winskill EI
Comments				
				Created Date
Please change the milk variety from fat-free chocolate milk to 1% (low-fat) chocolate milk on the production records.				4/10/2019 12:49:55 PM
03/27/2019	377	305	Administrative Review	ALL
Comments				
				Created Date
SFAs may claim visiting school-aged students outside of the district in the paid category or the individual's benefit category with documentation, unless they are from a CEP school. In order				3/27/2019 9:38:01 AM

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<p>to ensure the full meal cost is covered when serving visiting students, it is recommended to either charge the student the paid student price and claim in the paid category, or charge the adult meal price and not claim the meal.</p>	
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