

Administrative Review Report

Argyle School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/14/2019	04/08/2019
On-Site Review	05/07/2019	05/08/2019
Site Selection Worksheet	03/14/2019	03/14/2019
Entrance Conference	05/07/2019	05/07/2019
Exit Conference	05/08/2019	05/08/2019

Commendations:

Thank you to the staff at the Argyle School District for the courtesies extended to us during the Administrative Review. It was evident that all staff cares for the well-being of their students and also that the students respect the school food service staff.

Thank you for sending documentation prior to the onsite visit as this greatly expedited the review. Additionally, we appreciate your flexibility in using the new SNACS software for the audit process. The food service director exemplifies great understanding and knowledge with regulations. The planned menu and execution of the meal service met all standards; additionally, it is evident that students have been informed on reimbursable meals. All staff were open to suggestions and feedback.

Staff maintain a very pleasant meal preparation and service environment in a beautiful school cafeteria. Production and service spaces are clean and tidy. Keep up the good work!

Awesome job and thank you for what you do for kids!

Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, and many other topics. More information along with other upcoming trainings and webinars can be found on the DPI School Nutrition Webpage.

SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications & marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Find more information on these training opportunities on the DPI School Nutrition Training Website (<https://dpi.wi.gov/school-nutrition/training>)

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Technical Assistance:

Summer Meals Programs

School Districts providing summer school/summer enrichment activities for children are encouraged to consider the three distinct funding opportunities that would allow for the continuation of school meals into the summer months. These opportunities include: extension of your current program, the Summer Food Service Program, and Seamless Summer Feeding Option. For a full description of each [summer meals](#) option along with other resources, visit the DPI School Nutrition webpage (<https://dpi.wi.gov/community-nutrition/sfsp/summer-choices>).

Food Pricing

Argyle School District was not required to raise prices since the nonprofit food service account had a positive balance as of January 31, 2017. In addition, although the SFA is compliant with the non-program food revenue ratio, some items are priced well below the recommended amount. Since food costs, labor costs and purchased services costs are continually rising, we encourage the SFA to evaluate meal and non-program food prices.

Food Safety Plan

Update the food safety binder with site specific SOPs for Field Trip Meals and Time as a Public Health Control. We recommend that new SOPs are reviewed by your sanitarian.

Sharing Tables and No Thank You Tables

[Sharing Tables/No Thank You](#) Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type is outlined on the DPI School Nutrition webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

Disclosure and Sharing of Information

[Disclosure and Sharing of Information](#): Free and reduced price eligibility information is to be used only for determining eligibility for meal benefits. The SFA must seek written consent to use the information for non-program purposes, such as fee waivers. SFAs must allow households to limit consent to only those specific programs they wish to share information. SFAs may not use a blanket fee waiver. Nonfood service staff receiving eligibility information must sign the Disclosure Agreement form (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>).

Special Dietary Requests

A signed medical statement from a licensed medical professional or an approved IEP must support all food substitutions not meeting meal pattern requirements. SFAs may make food substitutions, without a signed medical statement from a licensed medical practitioner; however, these must meet the USDA meal pattern requirements in order for the meals to be reimbursable. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Limited English Proficiency

[Application materials](#) concerning eligibility determinations must be provided to households with limited English proficiency, to diminish any language barriers to participation. The SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong. The USDA Food and Nutrition Service (FNS) website offers many other foreign language translations of the Application for Free and Reduced Price School Meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>).

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Findings and Corrective Action:

Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
Corrective Action History		<p>Finding: The SFA's Unpaid Meal Policy states, "if the account balance is more than \$5.00, a check will be mailed out at the end of the school year..." Please remove the \$5.00 limit to this statement, as all funds need to be returned to the family or donated to a fund 50 assistance fund.</p> <p>CA: Provide a timeline of when the policy will be updated and how households will be notified annually.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
Corrective Action History		<p>Finding: on the Annual Financial Report, not all of the revenues and expenses were broken out by program and expense category (7 CFR 210.19). There were no revenues and expenses allocated to non-program foods.</p> <p>CA: Review the Annual Financial Report webcast on the DPI website. Submit a statement of how non-program foods will be allocated on the annual financial report going forward.</p>
Form Name	Indirect Costs (712)	
Question #	712	
Corrective Action History		<p>Finding: Indirect costs of 15% of an administrative assistant's salary is being charged to the nonprofit school food service account, which is unallowable in Wisconsin.</p> <p>CA: All costs charged to the nonprofit school food service account must be made into direct costs. Conduct a yearly time study of the administrative assistant's duties as related to the food service program to determine what the direct cost would be. Indicate the percentage of time that can be charged to fund 50. If the indirect amount charged is greater than the direct cost calculated, the difference will need to be refunded to the nonprofit school food service account for SY 2017-18 through the Administrative Review.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
Corrective Action History		<p>Finding: The SFA did not inform households about the availability and location of free meals for the Summer. Even though a summer feeding program is not operated at Argyle School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer</p>

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	<p>months. SFAs can inform families of summer meals via the following methods:</p> <ul style="list-style-type: none"> • Promotion of the summer meals locator 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 website (http://www.fns.usda.gov/summerfoodrocks.) <p>CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Families can call 211, text 'food' to 877-877, or the summer meals locator found on the DPI school nutrition website.</p>
Site Name	
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	128
Corrective Action History	<p>Finding: Applications with one income frequency were annualized. If a household has only one source of income or if all sources have the same frequency, the income should not be annualized.</p> <p>CA: Review the Income Conversions section of the Eligibility Manual (pg. 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced price meal application.</p>
Site Name	
Form Name	Meal Counting and Claiming (314 - 316)
Question #	314
Corrective Action History	<p>Finding: Field trip meals are being charged to student accounts from the morning roster.</p> <p>CA: This process was corrected onsite. No further action is required.</p>
Site Name	
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action History	<p>Finding: Materials related to the food service program do not contain the USDA nondiscrimination statement (NDS) or contain the incorrect NDS. Materials associated with the meals programs must contain the USDA NDS. The NDS cannot be altered and the font must be the same size as the font in the body of the document.</p> <p>CA: Add the full NDS to the Unpaid Meal Policy. Change to NDS on the menus to the current shortened statement of</p>

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		'This institution is an equal opportunity provider' and increase the font size to match the font size in the body of the document. Upload the corrected documents into SNACS. Upload a copy of the corrected documents into SNACS.
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
Corrective Action History		<p>Finding: Five non-school nutrition staff who have responsibilities for program(s) did not receive job specific training (7 CFR 210.30).</p> <p>CA 1: Have four non-school nutrition staff members that are responsible for the POS, watch the civil rights PowerPoint presentation and provide a statement that this has been completed.</p> <p>CA 2: Provide a training plan for non-school nutrition staff, with POS responsibilities for 4 hours of applicable training including offer vs. serve and upload the plan. When these trainings are completed, record on a training tracker.</p>
Site Name		
Form Name	Wisconsin School Day Milk Program	
Question #	8	
Corrective Action History		<p>Finding: Daily POS count sheets were not available for review. The Wisconsin School Day Milk Program (WSDMP) was not offered on the day of review; however, the counting and claiming process was reviewed along with current count sheets. The process is being done accurately and within guidelines.</p> <p>CA: It was discussed and understood on the review that the daily count sheets must be kept for a minimum of 3 years plus the current year. No further action is required.</p>

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Technical Assistance:

Alternate Entrees Offered Daily

The review site for Argyle School District is Middle School. When reviewing the production records for the week of review, it was observed that the planned portion size of one PBJ Uncrustable that is offered daily to K-5 students credits as 1.0 oz eq grain and 1.0 oz eq meat/meat alternate.

Since the elementary site is not being reviewed, TA was provided on the weekly grain and meat/meat alternate requirements. The FSD remedied the planned menu by adding an additional 1.0 oz eq grain and 1.0 oz eq meat/meat alternate to the alternate meal.

Smart Snacks

Foods and beverages sold to students during the school day that is intended to be consumed during the school day are subject to the nutrition standards outlined in the All Foods Sold in School Rule which was finalized in 2014. Foods sold to students need to meet calories, sodium, and fat restrictions while beverages are also monitored for portion size, calories and caffeine content. During the Administrative Review, the SFA's a la carte items, vending machines, and fundraisers are examined to ensure compliance. There is one Corrective Action item found related to Smart Snacks that is outlined later in this report.

SFAs in Wisconsin are offered an exemption related to fundraisers. Each student group may host two fundraisers per school year that are exempt, meaning the food items sold to students do not have to meet nutrition standards. It is required that one person at the SFA maintain a tracking sheet of all fundraisers during the school year. Both electronic and printer friendly documentation is available at the [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks)

Standardized Recipes

Recipes should be updated to reflect current practices and products. Technical assistance was provided for the recipe standardization process of Chipotle Mac n' Cheese. Recipe standardization ensures that each meal is consistently planned to meet the daily and weekly requirements. Continue to work towards recipe standardization and use all resources available to you. Visit our [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional tools and resources or [contact a Public Health Nutritionist](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) for assistance (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes; https://dpi.wi.gov/school-nutrition/directory).

Buy American

The Buy American Provision is a procurement standard that SFAs must comply with when purchasing commercial food products. It requires SFAs to purchase domestically to the maximum extent practicable. The Food Service Director should have the capability to distinguish what products are Buy American compliant and which are not during the ordering process through Sysco's online system. Please use this information to purchase domestically as often as possible and complete Noncompliant Tracking Forms when it is not feasible. A Corrective Action item pertaining to Buy American is outlined later in this report.

Findings and Corrective Action:

Site Name	Argyle Middle School
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1403

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Corrective Action History	<p>Finding: Items purchased for school food service and not produced in the USDA or do not provide a country of origin label.</p> <p>CA: Complete and submit Non-Compliant Product Forms for three products of your choice. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).</p>
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Site Name	Argyle Middle School
Form Name	Smart Snacks (1104-1107)
Question #	1105
Corrective Action History	<p>Finding: Noncompliant beverage items are available to students before the limit of 30 minutes after the school day end.</p> <p>CA: Please submit correspondence with the vending machine operator noting the request for the machine's time limits to be altered.</p>