

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

SFA Name: Mishicot School District 363661

Administrative Review Conducted on: 4/5/2017

Sites Selected for Review: O.H. Schultz ES

Date Corrective Action Plan was provided to SFA: 5/5/2017

Due Date for Corrective Action Plan: 6/2/2017

The following pages address the findings that were identified during your Administrative Review.
For each finding you will be presented with the following:

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| The finding, and details specific to the SFA regarding the finding | A summary of the regulation / requirement |
| The Code of Federal Regulations citation number or alternate resource citation | Suggested guidance for the SFA in order to achieve compliance |
| | SFA area for reply to state how, when and by whom corrections will be made |

Commendations & Suggestions

Outstanding job meeting all of the requirements for breakfast and lunch. All daily and weekly meal component and food quantity requirements were met for the week of menu review.

The SFA has a well-organized financial management system, and the documents submitted as part of the resource management review were sufficiently detailed and easy to follow.

Processing of applications was done very precisely and easy to review.

Staff do a wonderful job of helping the students to make good choices. The fruit and veggie bar was inviting and well received.

Other areas of Technical Assistance (NOT requiring Corrective Action)

The wellness policy committee should continue to meet to update the wellness policy.

If a student with a special dietary need submits a note from a recognized medical authority, the SFA should make reasonable accommodations according to this note.

Once an assessment tool for the Local School Wellness Policy has been completed, it should be made available to the public. An easy and common way to do this is to publish this on the website directly below the most current Local School Wellness Policy.

Smart Snacks- If the SFA decides to sell any items that require any condiments, these would be included in the check to ensure the food item meets Smart Snack requirements.

There is one new full time employee who has not met the training requirements and not enough hours of training have been planned. TA was provided for the SFA to plan additional trainings.

Resource Management – Adult Meals

The SFA was \$.03 out of compliance for adult meal pricing in the review year, but self-corrected by raising the adult meal price \$.15 for the current school year. The SFA should ensure they annually recalculate adult meal pricing requirements using the most recent highest paid lunch price + reimbursements + commodities value. The DPI Adult Meal Memo was sent to the SFA in an email along with additional technical assistance. This memo, along with updated reimbursement rates and the value of commodities can be found on DPI's Financial Management website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>

Please provide a detailed response to each finding in the spaces provided.

| Finding #1 |
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| The SFA does not have a procedure in place for handling civil rights complaints for the Child Nutrition Programs. It does not state that they will not be handled internally and forwarded to appropriate outside agency. |
| Technical Assistance Provided |
| During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; all complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded. |
| Regulation / Citation and Summary |
| FNS Instruction 113-1 Section XV All complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place. Anonymous complaints will be handled as any other complaints, to the extent feasible, based on available information. |
| SFA Suggested Guidance for Compliance |
| To come into compliance with civil rights requirements, the SFA must develop a procedure that will be put into place to handle any discrimination complaints and to forward them to an appropriate agency. The process must outline the steps that will be taken when a complaint is received, the name and contact information of the agency that the complaint will be forwarded to, and the name(s) and title(s) of the person(s) who will be responsible for forwarding complaints to the appropriate agency. Please submit the procedure to the State Agency. |
| SFA Response |

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| Finding #2 |
| On-site monitoring was not completed for all or some of the sites within the SFA for lunch and breakfast. |
| Technical Assistance Provided |
| During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA did not complete on-site monitoring by the approved extension deadline. Since the SFA has multiple sites they are required to monitor the lunch counting and claiming system for each site in the SFA prior to February 1st of each year unless an extension was requested by the SFA and approved by the State Agency. |
| Regulation / Citation and Summary |
| 210.8(a)(1) On-site reviews. Every school year, each school food authority with more than one school shall perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting and claiming procedures, the school food authority shall: ensure that the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system authorized by the State agency under §210.7(c) of this part and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid lunches, respectively, served for each day of operation. |
| SFA Suggested Guidance for Compliance |
| As the corrective action response the SFA must complete the monitoring review for all sites within the SFA. Submit copies of the monitoring forms with the response. Please submit a process that will be put in place moving forward to ensure that all on-site reviews are completed prior to February 1st of each year. Please identify the name(s) and title(s) of the person(s) who will be responsible for completing on-site monitoring. |
| SFA Response |
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| Finding #3 |
| An assessment of the Local School Wellness Policy has not been completed. |
| Technical Assistance Provided |

During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.

Regulation / Citation and Summary

210.30 Local School Wellness Policy (e) Implementation assessments and updates. Each local educational agency must: (1) Designate one or more local educational agency officials or school officials to ensure that each participating school complies with the local school wellness policy; (2) At least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public. The assessment must measure the implementation of the local school wellness policy, and include: (i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and (iii) A description of the progress made in attaining the goals of the local school wellness policy.

(3) Make appropriate updates or modifications to the local school wellness policy, based on the triennial assessment.

SFA Suggested Guidance for Compliance

To come into compliance with this requirement the SFA must submit a statement that and assessment of the wellness policy will be completed by the wellness committee. In addition to the statement the SFA must submit the minutes from the meeting that was held to complete the assessment. If the assessment has been updated by the corrective action due date, submit a copy of the assessment report. If the due date is prior to the completion of the assessment, submit a detailed timeline for the completion of the assessment. Once it is completed copy of the assessment should be submitted for review.

SFA Response

Finding #4

The SFA has not performed SFSP outreach.

Technical Assistance Provided

It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.

Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites.

Methods to locate sites that serve free meals to children during the summer include the following:

- Call 211
- Call 1.866.3Hungry or 1.877.8Hambre
- Visit the website: www.fns.usda.gov/summerfoodrocks (note, this replaces the whyhunger.org website)
- Use the site locator for smartphones - Rangeapp.org

Regulation / Citation and Summary

210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.

SFA Suggested Guidance for Compliance

To come into compliance with this requirement, the SFA must submit an assurance that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.

SFA Response

Finding #5

Resource Management Comprehensive Review – NonProgram Food Revenue
Prior to the review, the SFA did not determine compliance with nonprogram food revenue requirements.

Technical Assistance Provided

The NonProgram Food Revenue Tool or DPI's NonProgram Price Calculator Tool should be completed every year. During the review, the SFA completed the DPI tool and submitted it to the reviewer, but the tool was only partially completed. The SFA did not include adult meals and extra milks, and the SFA did not fill out the "number sold" column for the nonprogram food section. The SFA should revise the tool and resubmit a completed copy as part of this review. If the tool shows you are out of compliance, you need to increase nonprogram food prices.

Regulation / Citation and Summary

7 CFR 210.14 (f) Revenue from non-program foods. Beginning July 1, 2011, school food authorities

shall ensure that the revenue generated from the sale of non-program foods complies with the requirements in this paragraph.

(1) Definition of non-program foods. For the purposes of this paragraph, non-program foods are those foods and beverages; (i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account.

(2) Revenue from non-program foods. The proportion of total revenue from the sale of non-program foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining non-program foods (ii) The total costs associated with obtaining program and non-program foods from the account.

SFA Suggested Guidance for Compliance

As the corrective action response, please explain the process that will be put into place to ensure that the USDA Nonprogram Food Revenue Tool or the DPI NonProgram Price Calculator Tool is completed each year. This should include a timeframe for when the tool will be completed, the name by position of the person responsible for completing the tool, and the steps that will be taken if the tool shows you are out of compliance. Additionally, submit a completed copy of the tool. If the tool shows you are out of compliance, include a plan to increase nonprogram food prices.

SFA Response

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