

**Administrative Review Summary Report  
Technical Assistance and Corrective Action Plan**

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**Agency Code:** 406300 **School Food Authority:** West Allis School District

**School(s) Reviewed:** Lane Intermediate, Pershing Elementary, Nathan Hale High School

**Review Date(s):** March 7-10, 2016 **Date of Exit Conference:** March 22, 2016

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

This administrative review summary report identifies the areas reviewed. As discussed at the exit conference, prompt corrective action is required for the findings identified below and/or in the corrective action plan left for the attention of the authorized representation at the exit conference. **Documentation of corrective action must be received within 30 days of the date negotiated at the exit conference.** The SA may extend the time frames established for corrective action upon written request of the SFA only if extraordinary circumstances arise where the SFA is unable to complete corrective action within the originally negotiated time frames.

Fiscal action must be assessed when SFA claims or receives more federal funds than earned under 7 CFR 210.7. Notations are provided under each section to specify potential for fiscal action. The SFA will be notified if meals are disallowed or reimbursement is recovered and the right to appeal. Please submit the written response for any unresolved violations by the negotiated corrective action date listed on last page of this document. Include documentation needed to demonstrate corrective action was completed, where specified.

**Commendations/Noteworthy Initiatives:**

Thank you to all of the school food service staff for your attention to this review process- both offsite and onsite. Staff were receptive to recommendations and not hesitant to ask questions.

- CEP implementation in 8 schools; resulting in increased meal participation
  - Documentation of the Paid Lunch Equity Tool
  - Recently reviewed Wellness Policy with goals addressing Smart Snacks, incorporating Smarter Lunch Room techniques, allowing for adequate time to eat meals, and a plan to monitor implementation of the policy moving forward
  - Future Chef's competition
  - Fresh Fruit and Vegetable Program onsite distribution and incorporation of strong nutrition education messages
  - Promotion of the Summer Food Service Program
  - Improved point of service counts at Afterschool snack programs
  - Principals' involvement and interest in promoting positive nutritional initiatives and school environments

## A. Meal Access and Reimbursement

### Certification and Benefit Issuance

#### **Standard Meal Counting & Claiming**

Appropriate documentation was gathered in advance for the 525 student names selected from the district's benefit issuance list as the statistical sample.

- Free meal benefits were properly extended to all eligible students in households. Students that were directly certified or approved for benefits based on an application or other documentation received the appropriate notices.
- Households submitting applications that did not qualify for meal benefits were correctly denied and properly notified of the appeal procedure in writing.
- Direct certification match results are obtained a minimum of three times (at or around the beginning of school, three months after initial effort and six months after initial effort) to meet USDA requirements.

The time and effort to gather and organize this documentation streamlined the onsite review process and was much appreciated. The DO should be commended for very minimal errors.

**Finding #1:** All but 2 students were correctly certified for free or for reduced price meal benefits based on direct certification match results, applications, homeless or foster child status. These few errors are summarized below:

- Application Coded A – A source of income was overlooked and the student in the household is not eligible for reduced price meal benefits. The DO followed up with the household to find out there was a change in income but the household did not qualify for free or reduced price meals. A ten-calendar day notice with appeal rights will be sent on March 10 and the status change will be made in Infinite Campus on March 20, 2016
- On-line Application Coded B – A nine digit FoodShare case number was provided for on line application for one student. Valid case number for this program is 10 digits. The DO is contacting the household to obtain valid case number or income amounts. She agreed to document information received, make appropriate eligibility determination and update, if necessary, status of household in Infinite Campus.

**Corrective Action:** Confirm that appropriate action was taken to resolve the error for application B. Complete the "Date of Correction" column on the SFA-1 form for both errors and return via email scan to the NPC.

#### **Technical Assistance**

- Households must fill in the boxes to report number of household members when completing the newly revised free and reduced price meal application. An application with the box left blank, or with conflicting information is considered to be incomplete. Contact households to confirm the number of household members and make notations on the application to document the required information received.
- Several households were confused about how to report income by source in the columns provided on the free/reduced price meal application. Continue to follow up when households appear to carry over income figures from columns C-E and double report income in column F (special situations for seasonal or annual earnings). Document outcome of the contact.
- The DO understands that free meal benefits for a foster child cannot be extended to other students in a household. Information pertaining to approving household for free or reduced price meals for the non-foster children that reside in a household with foster children. The funds foster parents receive for foster care is not considered income for eligibility determinations. It is the household's option to list or not list the foster children as household members. Please see page 35 of USDA's *Eligibility Manual for School Meals* (July 2015).

- Consider approaching the software provider to include approved eligibility status (free or reduced price) on the processed application detail report unless other reports available in the system specify status.
- Confirm that instructions for completing the on-line application uses Wisconsin term for SNAP (FoodShare) and for TANF (W-2 Cash) so households recognize the programs to ensure that households are not confused.
- Decreasing Free and Reduced Application Paperwork at the Start of the School Year:
  - If the *Free and Reduced-Price Meal Application and Instructions/How to Apply* are available online, at a minimum, the *Parent/Guardian Information Letter/Frequently Asked Questions* which explains how to get a paper application must be mailed or emailed to the households not on direct certification.
  - The *Parent/Guardian Information Letter/Frequently Asked Questions* cannot be on a postcard as all required information does not fit.
  - The district will need a way to identify families that do not have an email and send the *Parent/Guardian Information Letter/Frequently Asked Questions* as a hard copy.
- West Allis uses the WI sharing form with district specific modifications; work to make your sign-off by program *more specific*. Parents must have the ability approve or decline sharing of their child's income information for these outside programs by program.

### **Community Eligibility Provision (CEP)**

- Excellent job tracking 100% CEP applications and creating an internal system to charge these processing costs back to the district.
- The DO ensures all modified language USDA applications are complete; even CEP educational benefit applications. This ensured an easier transition as students transfer within district from a CEP school to a non-CEP.
- Continue working with your software company to track 100% CEP online applications so this is not a manual task. I commend the DO for keeping the data separate despite the tech challenges; she reached out to Infinite Campus to address enhancements that would make CEP data separation and reporting easier.
  - CEP online applications
  - Verification Pool and Sample Size
  - *CEP Free Meal Count Category* and Edit Check Report
- DPI allows for a similar 30 operating day carryover of educational benefits (Title 1/SAGE). CEP students themselves do not carry *individual meal eligibilities* to use as carryover; so if a CEP student attends a non-CEP school the following year, documentation to support last years' **completed** modified CEP language USDA application or DC match will need to be on file. If this is not the case, the student does not have carryover and the household must establish a new meal status for the current year.

### **Verification**

- Great job overall with the verification process despite the challenges CEP and software functions presented this year. The DO reached out to DPI offsite prior to the verification process and completion of the verification collection report. She identified an error in the software's' ability to separate CEP and non-CEP applications and was able to manually adjust the pool, sample, and VCR. Emails are retained from 10-15-16, and 1-13-16 to document the technical assistance exchanged. Continue to work with your software company to reach compliance so this process does not have to be completed manually in the 2016-17 SY.
- As a reminder, if meal benefits are to be decreased, the family must be provided a full 10 *calendar days* to appeal the decision from the date the letter is sent (day1). The EM does outline that the district then has an additional 10 *operating days* to implement the change on the BI list; but is not in place to purposely delay/postpone updating the benefit issuance list.

## Meal Counting and Claiming

### Technical Assistance

- Consider using PIN numbers for lunch at the CEP elementary schools. This will auto-populate daily counts and totals onto a site edit check report- making claim consolidation easier.
- Continue working with Infinite Campus to create a better way to track total CEP meals for the clicker and BIC roster counts. Running the detailed reports is not ideal for staff to calculate total reimbursable meals or conduct a monthly edit check at these sites. Manual summation may also result in higher risk for over/under claiming due to human error.
- Consider developing a template to capture all BIC/clicker breakfast totals p/t daily entry in the POS system at Pershing El and other similar sites. Retain this document as part of records to support the source of meals claimed. The current BIC roster form could be modified with a section for food service to record clicker totals.
- Consider a PIN number point of service roster printed out from Infinite Campus for ease in entry of Shared Journeys daily breakfast participation counts. This report would then be emailed to the office on a daily basis. Regardless of system used, the district must document counts are tracked at the point of service where it can be determined the student has a reimbursable breakfast.

### Site Level – Day of Review

Meal counting system provided accurate counts at the point of service and the meal counting procedures were consistent with those submitted on the approved online contract for the 3 schools selected for the AR; with the exception of breakfast in the classroom at Pershing Elementary.

**Finding #1:** The Pershing Elementary Breakfast in the Classroom roster form is shared between two classrooms; which makes it impossible for both teachers to be taking an accurate count as the student takes a reimbursable meal. There is also no communication system for counting and recognizing a reimbursable meal when substitute teachers fill in. As a result, there were 5 ineligible meals claimed at breakfast. Fiscal action will be taken on these 5 meals.

**Correction Action:** Populate two separate rosters for tracking reimbursable meals in the BIC rooms. Explain how the point of service system will be improved and communicated to substitute teachers. I recommend adding standard language to the student roster or folder outlining the process. Here is an example:  
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/pos-breakfast-meal-counts.docx>

**Finding #2:** Pershing Elementary offers a grab and go model which is not indicated on the online contract.

**Corrective Action:** Update the online contract to include the grab and go model under Pershing Elementary.

Necessary provisions are made to protect identity of students receiving free or reduced price meal benefits, with one exception:

**Finding #3:** The meal prices appear on the computer screens (e.g., \$2.30 for paid lunch price, \$.40 for reduced price lunch price and \$.00 for those eligible for free meal benefits) located on the meal serving lines at the Lane Intermediate School and at Nathan Hale High School. The eligibility status of the students is revealed.

**Corrective Action:** Follow-up with Infinite campus to remove the meal charge on the screen. Confirm via email when/how appropriate action was taken.

During onsite meal observation; auditors noted 1 non-reimbursable lunch and 2 non-reimbursable breakfasts at Lane Intermediate- these will be included in fiscal action overall.

## Claim for the Review Period

Claim consolidation errors at the district level were found.

**Finding #4:** The January 2016 National School Lunch Program (NSLP) and Severe Need School Breakfast (SNBP) claim revealed discrepancies during consolidation at the district level. Total counts from the site based edit check reports were compared against the SFA submitted total counts. The counts the school used for the claim were taken from an Infinite Campus transaction summary report (non-CEP sites) and from a combination of detailed reports and an external Sodexo report (CEP sites). CEP site total daily counts were not added together correctly and thus resulted in discrepancies. The claiming percentages used were the most current; however, the daily totals were not accurate p/t applying the claiming percentages.

\*The auditor and SFA noted discrepancies in counts reported on the edit check, transaction summary report, and detailed report. Continue working with Infinite Campus to resolve the discrepancy between reports. For audit purposes, accurate counts will be obtained off of the edit check reports per SA guidance.

**Corrective Action:** Follow USDA prescribed procedures for consolidating claims by completing the edit check by site. Evaluate any daily counts that exceed attendance adjusted eligible and correct any count errors prior to consolidating edit check counts for each of the schools that are submitted on the one monthly claim.

- Submit March's NSLP, SBP, and SNBP claim online. Email supporting site based edit check reports to the NPC. All sites should use the software edit check report except for the CEP Elementary Schools. These will need to be recorded on the CEP manual edit check form <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/cep-editcheck.xlsx>, because the daily counts do not pull into the edit check report. This process must happen each month prior to online claim submission to DPI.
- School consolidated edit check counts for the September – December 2015 were obtained onsite. **Fiscal action will be taken back to the beginning of the school year to make appropriate count adjustments and determine if there was an over or under claim.**

**Finding #5:** SFA is not reviewing monthly edit check reports and signing off on the claim for accuracy p/t submission to DPI office. Note: Sign off and review of the edit check reports cannot be done by the FSMC.

**Corrective Action:** Review edit check reports for the district monthly and sign off; retain for records. Begin this process as of March and moving forward.

**Finding #6:** The number of Free and Reduced Eligible and total enrollment were incorrectly reported on the monthly claim. Numbers reported were recycled month to month from an unclear source.

**Corrective Action:** Obtain each sites' highest enrollment, number of free, and reduced eligible for non-CEP sites off of the monthly edit check report. Also obtain this information from the edit check report at CEP sites; however, to obtain the highest number of free eligible, take the highest enrollment at the CEP site and apply the free claiming percentage (e.g.,  $200 \times .94 = 188$ ). The CEP sites do not have reduced eligibles to report. For elementary CEP sites, this information will need to be obtained from another report because the district is using the detailed report.

**Finding #7:** Shared Journeys is a recognized school by DPI and participates in breakfast only. Students are dual enrolled as part of this Charter school and a home high school within the district. The students eat lunch at their home school, which is where those meals are counted. Currently, breakfast meals are being manually tracked back to their home high school even though they did not eat there. Also, there are Severe Need

Breakfast counts incorrectly entered in the contract even though these students do not eat lunch at Shared Journeys.

**Corrective Action:** Track Breakfast counts separately for Shared Journeys. Remove SNB counts from contract and change participation from Severe to Regular Breakfast. Moving forward the district will now report a total of 2 Regular Breakfast programs. Shared Journeys will not be SNBP or CEP eligible at this time because they do not offer a separate lunch program.

## **B. Meal Pattern and Nutritional Quality- (Section III)**

### **Meal Components & Quantities/ Offer vs. Serve/ Dietary Specifications**

#### **Commendations**

- Thank you very much for organizing all of the paper documentation for the meal pattern review. There are a lot of different choices offered to all schools at both breakfast and lunch. This variety takes a great deal of time to plan and organize. Having this prepared ahead of time helped us review the menus quickly.
- Thank you to each of the site leads and all production staff during the onsite observations. It is very apparent that the Food Service Staff at West Allis School District is passionate about providing quality meals for the families.
- The cafeterias and lines set up at all three sites were bright and colorful. This creates an appealing environment. The salad bar at Pershing Elementary in particular was noteworthy.
- Staff noted use of Smarter Lunchroom techniques (window clings on salad bar) to “nudge” students towards choosing healthier options.
- Thank you to the FSD for quickly retrieving answers and responding to findings, such as the multiple sizes of apples for the lunch versus snack.

#### **Technical Assistance**

- The crediting information is not included on the production records. While this is not required to be listed, it does make it hard for the cashiers to accurately recognize Offer vs. Serve. Consider creating cheat sheets with up to date product information that list each product's crediting. Consider using “item” terminology as this is how reimbursable meals are recognized at breakfast.
- Continue to decipher between ounces by weight, fluid ounces, and ounce equivalents. These are often all abbreviated to “oz” but mean very different things depending on the applicable menu item. The site lead at Lane intermediate was confused between dry weight of raw pasta and a fluid ounce serving size. This was corrected before meal service, but if repeated or applied to other recipes this would contribute to excess food waste and meals served not containing proper quantities.
- Product Formulation Statements (PFS) kept on file need to include the source of the creditable ingredient, the amount of each source, and the ready to serve portion size that contributes a certain amount to the meal pattern. Please request more information from Jennie-O for the deli turkey used. The sample PFS template for meat/meat alternate items can be found; <http://www.fns.usda.gov/sites/default/files/PFSmma.pdf>. This should be printed on company letterhead.

**Finding #1:** Meal signage is required for breakfast and lunch meal service. These should include everything the student has access to (4 items at breakfast, and 5 components at lunch) and what they must take to make a reimbursable meal. Although the menus were posted at each site, there needs to be some explanation regarding what is offered and what must be select.

**Corrective Action:** Please submit evidence of signage being posted at each site, or a written statement regarding what signage will be posted.

**Finding #2:** Sliced bread and cereal bowl packs included on the order guide were not whole grain-rich.

**Corrective Action:** This was corrected immediately by the Food Service Director. No further action is needed for submission. Continue to regularly review all grain products to determine whole grain-rich status.

**Finding #3:** Additional Offer vs. Serve training is requested for breakfast and lunch meal service. At Lane Intermediate, the point of service personnel was counting tator tots as the fruit/vegetable occasionally. This should only be done if there are 2 cups of other vegetables offered during the week at breakfast. Reviewing Offer vs. Serve with each site regularly helps to increase confidence and ensures meals claimed for reimbursement are reimbursable.

**Corrective Action:** Please provide a written statement regarding the future training plan for Offer vs. Serve.

**Finding #4:** An updated recipe is needed for the Sizzling Chicken Fajita recipe (Nathan Hale, Thursday January 14). The USDA Brown Box Chicken Fajita Strips #100117 is not available to schools in Wisconsin. Therefore the product being used at Nathan Hale must be a different one. If the Wisconsin Processed Chicken Fajita Strips, Gold Kist/Pilgrim's Pride is the product used, then the recipe needs to be updated to reflect the crediting information of that product (each 2.45 oz. serving provides 2 oz eq. meat/meat alternate).

**Corrective Action:** Please submit the revised recipe to reflect the product currently used. The meal will need to include 2.0 oz eq. meat/meat alternate to meet the daily requirement for the 9-12<sup>th</sup> grade group.

## C. Resource Management

### Technical Assistance

- USDA has issued guidance regarding the need for SFAs to seek preapproval from the State Agency for Food Service equipment purchases with a useful life of a year or longer and a cost that equals or exceeds the federal per unit capitalization threshold of \$5,000 or a lower threshold set by the SFA. This applies to equipment purchases made after January 1, 2015. The purpose is to assure the cost is necessary and can be absorbed by the Food Service account. For items less than the SFA or federal capitalization threshold, no pre-approval is necessary. For items at or above the threshold, DPI has developed a list of pre-approved equipment that can be found on the website <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/preapproved-equipment.pdf>. If the new equipment is on the DPI pre-approval list, no further action is necessary. If the item is not on the list the SFA will need to submit an approval form to DPI.
  - Equipment purchases at or above 5K after January 2015 were reviewed and found to be on the pre-approval list. The SFA did have a large expense for 4K tables and chairs for the lunch room which should have been prorated based on Food Service use. Moving forward, Fund 50 cannot absorb 100% of this kind of expense when use of tables and chairs is shared among other programs.

**Note:** Equipment purchases over the capitalization threshold will be reviewed during Administrative Reviews and audits. Any equipment determined to be unallowable due to it not being on the pre-approval list, not being pre-approved through DPI, and not properly procured will be disallowed and DPI may implement debt collection procedures.

### Food Service Annual Financial Report

**Finding #1:** Expenses and revenues were not properly allocated by programs.

**Corrective Action #1:** Submit a written action plan as to how the district will ensure the Annual Food Service Report will more accurately reflect the expenses and revenues by program. It is highly recommended that staff attend the SNSDC courses in MLK this summer, which will cover how to complete the food service annual financial report along with major changes in reporting for the upcoming school

year. A current reference manual on submitting the Annual Food Service Report can be found here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-manual-2015.pdf>

**Finding#2:** The annual financial report beginning and ending fund balances did not match the districts DPI audited report. The beginning balance on July 1 should be the ending balance from June 30 of the prior reporting year, which was \$1,098,934.18. Revenues and expenditures were accounted for; but allocated incorrectly by program providing an inaccurate representation of per meal cost and revenues.

**Corrective Action:** Update the food service annual financial report *beginning balance* for the 2014-15 SY. To do this you will need to print off the current report in online services, write in the updates, and fax or scan and email a copy to the accountant and copy the NPC on the submission.

## Revenue from Non-program Foods

### Technical Assistance

- The non-program food regulation requires total revenue generated from all non-program foods to be greater than or equal to the total cost of all non-program foods. Examples are anything a la carte sold outside of the reimbursable meal/snack, catering, items purchased for fundraisers, vending machines, school stores, a la carte milks, adult meals, etc. Costs must include food, labor, and supplies. If the overall cost of these items exceeds the revenue brought in, reassess the selling price. Food service program funds cannot be used to support non-program foods. Guidance in this area has recently been updated by USDA – I recommend attending an SNSDC course to review the required use of the USDA non-program food tool: [http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr\\_tool.xls](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls). <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf> . This is an annual assessment.
- Adult meals are considered non-program foods. However, the charge for an adult meal must cover at a minimum all federal and state student reimbursements. Districts need to reassess adult meal prices annually prior to contract submission (June) to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2015-16 SY) should be used to determine 2016-17 SY prices because the rates are released after July 1 of each year. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/school-nutrition-reimburse-rates-15-16.doc> Below is a link to the formula that should be used to determine pricing. Additionally, I advise the district to consider what the *actual* per meal cost is for lunch and breakfast and set meals prices accordingly. The Child Nutrition Report can be used as a tool to assess the previous years' per meal cost and per meal revenue granted the report was correctly allocated. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>
- SFAs must annually be provided information on food costs and revenues from Food Service Management Companies (FSMC) for fixed price per meal contracts. The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine the SFA's compliance with the revenue from nonprogram food requirement. Previously, FSMCs may not have disclosed food cost data in a fixed price contract awarded on a per meal basis or revenues from nonprogram food sales which are converted into meal equivalents. It is now required to be broken out in the FSMC contract.
- At CEP schools, students are provided with a free *reimbursable meal* (breakfast and lunch). If a student declines the reimbursable meal (brings cold lunch and wants only milk) or does not take the required components; they must be charged ala carte to cover those items. If the district would like to provide these items for free it must be tracked and transfer into Fund 50 made to cover the cost of the additional items.

**Finding #1:** West Allis cannot *readily* track and separate *all* non-program food cost and revenue from program food cost and revenue. These expenses and revenues should be easily identified. It appears revenues

generated slightly more than cost overall for non-program foods based on the USDA tool that was requested during offsite. However, overall, I do not have confidence that all items are being monitored on an annual basis to assess overall compliance with this regulation.

**Corrective Action #1:** Provide a written statement via email as to how the district will document and monitor compliance for all non-program foods moving forward.

**Finding #2:** The SFA is not charging enough for an adult lunch or breakfast meal to cover all student reimbursements.

**Corrective Action #2:** Increase your Adult meal charge to at least the minimum requirement so student funds are not being used to subsidize adult meals. Consider rounding up to make money collection easier. Prices will need to be set higher at CEP schools to cover the free reimbursement rate received. I recommend the district consider if they want to have differing adult prices for the same meal at CEP and non-CEP site; or raise the charge equally across the board.

CEP Adult BF (\$1.93 + \$0.0909= **\$2.02**)  
 CEP Adult Lunch (\$3.06+\$0.2475+.0447= **\$3.35**)

**Finding #3:** West Allis sells second meals which are no longer allowable under the new Smart Snacks regulation as a *bundled meal* does not fit the nutrient standards.

**Corrective Action:** Sell items ala carte and determine if individual items meets Smart Snacks standards or replace/discontinue sale of those items. Most items that are part of the reimbursable meal will meet the standards (fruit serving, milk, entrees are exempt day of and day after).

**Procurement**

DPI's procurement website:

- Procurement - What's New!: [Required Contract Provisions \(2 CFR 200-Appendix II\)](#)
- Procurement Methods: <http://dpi.wi.gov/school-nutrition/procurement/methods>
- Buy American Provision: <http://dpi.wi.gov/school-nutrition/procurement/buy-american>
- Federal and State Procurement Regulations: <http://dpi.wi.gov/school-nutrition/procurement/regulations>



FFWP Contract  
 (6) - Family Ed...

Contract Management	<p><b>Note:</b> West Allis SD wasn't able to show it had verified invoiced payment with contracted pricing. West Allis SD should improve its contract management process to ensure contract compliance.</p> <p><b>TA:</b> West Allis SD will need to request from Sodexo invoicing which breaks down invoiced amount into amounts reflective in the awarded contract; number of meals for each of the line items (breakfast, lunch, a la carte, summer, etc.). This information will confirm invoiced amount is compliant with awarded contract including any renewals.</p>
Contract Management	<p><b>Note:</b> West Allis SD is paying for services not outlined in awarded contract; Fresh Fruit and Vegetable Program and Taste Tasting Grant. All of the programs are allowable and wouldn't result in a material change to the awarded contract.</p> <p><b>TA:</b> West Allis SD will need to amend its contract with Sodexo to reflect the new services being provided. The amendment for the Fresh Fruit and</p>

	Vegetable Amendment to the FSMC contract is attached. This amendment can be used as the basis to amend the contract for the taste testing grant. Only services and products listed in the contract can be billed to the school in an invoice. Some exceptions are allowable but to ensure each party to the contract understands its obligations and costs both parties should be diligent in outlining these activities and costs in the awarded contract.
Procurement	<b>Note:</b> Outside the procurement and awarding of the FSMC to Sodexo by West Allis SD, procurement records were hard to track down. Sodexo's procurement process is separated out which made it difficult to verify proper compliance with federal and state procurement regulations. I wasn't able confirm procurement was conducted properly but the FSD (Sodexo's Personnel) was amenable to making sure they added processes to ensure proper compliance. From what was communicated during the procurement review competitive procurement was being conducted but supporting records need to be accessible for review. This issue isn't one unique to Sodexo but to many of the procurements performed by FSMCs on behalf of schools. We would like to follow up with the FSD and other Sodexo employees in the future to ask questions to help us understand corporate procurement and contract management processes to ensure we as a state are able to obtain proper records without being overly burdensome to companies servicing schools.

#### D. General Program Compliance

##### Civil Rights

##### Technical Assistance

- USDA released a new non-discrimination statement and shortened statement. A DPI memo was mailed on 12-3-15. All materials (e.g. websites, pre-populated templates, menus etc.) communicating the USDA meal programs to the public must be updated with the new statement and cannot be modified from exact language in any way. New "And Justice for All" posters have been printed for meal service locations <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>.
  - Reviewer noted some sites with new (green) *And Justice for All* posters and some sites with an old red poster. Please update all sites with the new green posters mailed to your SFA.
  - The full non-discrimination statement is posted on the Sodexo calendar menu report that is sent to families. To save space, the shortened non-discrimination statement can be used, which is: "This institution is an equal opportunity employer".
- There is a public release requirement for both CEP and non-CEP sites. It is allowable to combine the two releases if that works better than sending out two separate releases. The templates are updated each year and are posted on the DPI CEP and Free and Reduced Price websites.

**Finding #1:** The Sodexo Intermediate School Lunch Menu posted on the SFAs website does not contain the correct non-discrimination statement (even prior to the recently released update).

**Corrective Action:** Update the menu with the most current statement (consider using the shortened statement). Submit a copy of this menu updated along with a timeline of when other similar documents in the district will be updated.

**Finding #2:** Civil rights training was not completed around the beginning of the school year; but prior to the onsite AR in February.

**Correction Action:** Submit a timeline as to when Civil Rights training will be completed and tracked next year and in subsequent years.

## Public Release

**Finding #3:** Documentation was not retained (email communication/fax transmittal) to support the public release was submitted to at least one media outlet and one grass-roots organization prior to the beginning of the school year. Per staff, the non-CEP release was done while reviewer was onsite and sent to WA NOW newspaper and the WA Health Department.

**Corrective Action:** Submit a written statement outlining where/when the public release will be submitted next year, how records will be retained and if the district will choose to combine the CEP and non-CEP public releases or send two separate releases.

## Special Dietary Needs

West Allis has students whom they are making dietary accommodations for without determining first if these are disabling or non-disabling requests. Be advised that umbrella non-disabling approvals for accommodations may pose a civil rights compliant if one accommodation is made while another is denied due to difficulty of the request.

As a reminder, U.S. Department of Agriculture (USDA) regulations 7 CFR Part 15b require substitutions or modifications in school meals for children whose **disabilities** restrict their diets. A child with a **disability must** be provided substitutions in foods when that need is supported by a statement signed by a **medical practitioner**. A form reviewed at Pershing Elementary school did not cover the following required components for food service documentation and should:

The practitioner's statement must identify

- the child's disability; (explicitly state if it is a disability or not)
- an explanation of why the disability restricts the child's diet;
- the major life activity operation of a major bodily function affected by the disability;
- and the food or foods to be omitted from the child's diet and the food or choice of foods that must be substituted.

A DPI form is available at: [http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special dietary requests form.pdf](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special_dietary_requests_form.pdf)

Disabling diet modifications **may not meet meal pattern (due to practitioner diet order) and can still be claimed for reimbursement**. LEAs must not stray from the diet order. If you need to clarify a diet order, I recommend working with the family who can directly contact the practitioner to provided clarification as they should be following the same practices at home. A multidisciplinary approach is always best to serve the student and family.

### Other Special Dietary Needs (non-disabled requests)

School food service staff (local district) may make food substitutions, at their discretion, for individual children who do not have a disability. **The school must still have a completed Dietary Request Form on file from a medical authority (could be a school nurse)** certifying the student as having a special medical or dietary need. Such determinations are only made on a case-by-case basis and all accommodations must be made **according to USDA's meal pattern requirements in order to claim**.

Review the use of appropriate fluid milk substitutions <http://dpi.wi.gov/school-nutrition/regulations> which must be nutritionally equivalent to cow's milk and pre-approved through DPI. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use. It may be a higher food cost to consider.

## Food Safety

- Refer to your local sanitarian for more information on retention of the Employee Health Reporting Agreements that could not be located while onsite.

**Finding#1:** DPI's food safety plan based on Hazard Analysis Critical Control Points (HACCP) principles template was downloaded and distributed to the schools. This template includes the required elements for a food safety plan as prescribed by USDA guidance. However, the template was not customized for each school operation.

**Corrective Action:** Customize the template by filling in site description and equipment inventory pages; categorizing menu items as process 1, 2 or 3 on chart provided; identifying what standardized operating procedures (SOPs) are applicable. Submit copy of the customized food safety plans for **Lane Intermediate, Nathan Hale High and Pershing Elementary Schools** as documentation.

**Recommendation:** Combine aspects of the Sodexo SOPs and the DPI template so the end result can be a working document for staff to reference. Use monthly meeting to have site supervisor at each location complete the description pages.

The 3-ring notebooks with the food safety plan template also included blank copy of each of the daily temperature monitoring logs. Food service staff at each of the schools selected for review are recording heat temperatures of food items on the daily production record, the temperatures of cold storage units and the dish machine wash and final rinse temperatures. Clarify/consolidate practices.

**Finding#2:** A review of the February and March 2016 dish machine temperature logs show that the rinse temperature was not at 180° for the dish machine at Lane Intermediate School on several dates. No corrective action was taken to ensure that trays, flatware, utensils, pans and other items were sanitized. Monitoring logs for the walk-in freezer at Nathan Hale High School showed temperature readings above 0°F on most days in March 2016. No corrective action was noted.

**Corrective Action Needed:** Instruct food service staff on appropriate action to take when dish machine rinse temperature gauge or temperatures on cold storage temperature logs are not compliant with the Wisconsin Food Code. Put in place provisions to review temperature logs and ensure that site supervisors are following through with instructions.

**Finding #3:** (1) the most recent food safety inspection reports were obtained from the West Allis Health Department during the on-site portion of the review for the review sites. However, the reports from the previous school year were not available to document if two inspections were completed/requests were made for the previous school year. In addition, there was no documentation to show that attention was given to resolve Wisconsin Food Code compliance issues. The district could not document the number of food safety inspections reported for each school on Schedule A of the on-line contract.

(2) The May 14, 2015 inspection report was posted in a publicly visible location at Lane Intermediate School. The posting requirement was not met at Pershing Elementary and Nathan Hale High Schools. The inspection report was taken down by a teacher at Pershing Elementary School to free up the school bulletin board for a display. The food service supervisor at Nathan Hale High School was not aware of the posting requirement.

**Corrective Action:**

- Request 2 inspections from the West Allis Health Department if one or more schools are not receiving required number of food safety inspections.
- Accurately report/update the number of inspections for each school site on the DPI online contract
- Ensure that the *separate* 4K buildings are part of the request to have two inspections per year. Moving forward, if the 4K classes move back into the elementary buildings- the inspections can be included as part of the elementary' s 2 per year.

**Note:** DPI and the Department of Health established a protocol for food safety inspections that occur in schools participating in the NSLP and/or SBP. Per the MOU, an inspection is physical presence at a school. A food safety plan review cannot be counted as an inspection unless it occurs at the school site. A food safety inspection and plan review that occurs on the same day can only be considered one inspection. **DPI has followed up with the city health department re: the protocol established in the MOU.**

- Develop a system for requesting/maintaining inspection reports with documentation of action taken to correct any Wisconsin Food Code non-compliance citations. Describe measures that will be taken to maintain this documentation. Provide written instructions to food service supervisor at each school regarding posting of the most recent food safety plan. Check to see if the inspection report are displayed during monitoring reviews. Include a copy of written instructions distributed to food service site supervisors and follow up activities to ensure that the inspection reports are posted.

**Recommendation:** Post most recent food safety inspection report next to "... and Justice for all" poster. Check to see if the inspection report and poster are displayed during monitoring reviews.

### **Technical Assistance**

- The process 1, 2, or 3 menu categorization chart in the food safety plan for each school must include menu items served. Recipes with process category is not a substitute for the chart. General categories may be used such as listing dairy products under process 1 instead of listing milk, cheese, yogurt, sour cream, cottage cheese as separate items on the chart. List "condiments" as a process 1 menu item (commercially prepared salad dressings, ketchup, etc.). List "pre-packaged snack items as process 1 menu item (corn chips, granola bars, etc.).
- Seek assistance from the environmental health specialist from the West Allis Health Department to provide written approval for time as a public health control for Time and Temperature Control for Food Safety (TCS) foods that are not held under mechanical refrigeration but discarded after meal service. Templates will be posted on DPI's food safety webpage. There is a SOP template for milk barrels on DPI SNT website. Milk that is monitored with recorded temperatures on logs or production record may be kept for service if the temperature is 41°F or below.
- Continue to follow up on ventilation problem at Lane Park Intermediate School to ensure that the food service preparation and storage area are free of excess condensation, per Wisconsin Food Code regulations.
- Work with food service staff to ensure that thermometer calibration is completed and logs are kept as documentation.

### **Local Wellness Policy**

West Allis School District recently updated the Local Wellness Policy (LWP) and it is awaiting board approval. Note the proposed rule also includes an *annual* assessment on the implementation of the LWP. The public should be notified of this progress report and SFAs are required to retain a copy of the assessment on file. The scope of the assessment should include the extent to which the SFA is in compliance with their LWP and the progress made toward achieving established goals and objectives. Consider using needs assessment tools suggested in the Wellness Policy Tool-Kit on pg. 7 of the below manual link <http://dpi.wi.gov/school-nutrition/wellness-policy/resources>  
<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>; final rule on the LWP is expected this spring.

### **Smart Snacks in Schools**

Starting in school year 2014-15, all food and beverages sold in schools during the school day must meet nutrition standards. The Smart Snacks in School regulation applies to items sold a la carte on the meal serving lines, in school stores, in vending machines and fund raisers. Each school organization is allowed two exemptions for fundraisers.

Principals in each of the schools were aware of regulations. They are using the Alliance for Healthier Generation Calculator and are invested in setting the tone for a healthy eating environment.

**Finding #1:** There was no documentation to show a la carte items were evaluated for compliance with Smart Snacks standards. Proper documentation includes nutrition fact labels from products and Alliance for Healthier Generation Calculator print outs. Resources for schools are available at DPI's webpage: [http://fns.dpi.wi.gov/fns\\_smartsnacks](http://fns.dpi.wi.gov/fns_smartsnacks) and at USDA's Smart Snacks webpage: <http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks>. Several items available for sale on the serving line and separate a la carte sale area were not compliant when entered into the calculator during meal observations at Nathan Hale High School.  
\*Additional *Summary of Observations Document* provided during exit along with the Smart Snacks in a Nutshell handout.

**Corrective Action:** Use Alliance for Healthier Generation Calculator to determine what existing food and beverages sold a la carte are compliant. Indicate in response intentions regarding evaluating all a la carte products, keeping necessary documentation, using up inventories of non-compliant products, and purchasing those products that are compliant. Submit copy of Alliance for Healthier Generation Calculator printouts for **Nathan Hale and Lane Intermediate** and update the list of compliant a la carte items to support corrective action.

## **Professional Standards**

West Allis is conducting and holding trainings for staff; however, they are not using a consolidated tracking tool, which makes it difficult to determine compliance at the individual employee level.

- o USDA and DPI have developed tools for SFAs to document trainings; resources can be found at: <http://dpi.wi.gov/school-nutrition/training/professional-standards>. The tool should include the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff).
- o Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.). WI allows for training hours to be completed over two years as long as some hours are obtained in both years. Learning codes are not required, but encouraged.
- o Other staff outside of food service but who work with the programs have not completed trainings thus far and should complete 4 hours per year. Civil Rights and Blood Borne Pathogen training can be counted each year along with job specific topics to complete hours.

**SNSDC Courses:** It has been recommend throughout the review that staff continue to attend DPIs free annual summer trainings in job specific areas. Specifically the financial basics and advanced basics classes, which cover claim consolidation, edit checks, and filling out the Food Service Annual Financial Report. Upcoming trainings and locations are posted here: <http://dpi.wi.gov/school-nutrition/training#up>. Milwaukee SNSDC course will be held on August 2-4 at MATC.

## **E. Onsite Monitoring**

**Finding #1:** On-site monitoring reviews of each schools meal counting and claiming procedures were not completed, as required. To meet USDA regulations, the on-site reviews must be completed by the district prior to February 1 of each school year and supporting documentation must be kept onsite. The onsite monitoring review form for use in mixed districts (CEP and non-CEP) can be found here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-onsite-monitoring-form.doc>

**Corrective Action Needed:** Complete the monitoring reviews of all reviewed schools and submit documentation to show the reviews were completed during the current school year. On-site monitoring

reviews should be conducted district-wide. Indicate in written response the action that will be taken to meet this annual requirement by February 1 in subsequent school years.

#### E. Afterschool Snack

Overall, review of the Afterschool snack program was far improved from the last time DPI reviewed the district. Great job in correcting the point of service counts and other issues noted.

- As a reminder, milk variety is not a requirement in the ASP.
- Consider working with DPI to approve additional snacks sites as "Area-Eligible". There is a likelihood that Lane Intermediate and Mitchell may qualify based other schools in their attendance area (e.g., Central HS that is >50% F/R). This would provide additional reimbursement because all snacks could be claimed at the free rate rather than the students' individual meal eligibility.
- Review the standard operating procedure (SOP) #12 on washing fresh fruit. During onsite observation, it was noted that the apples were served from the case without washing prior to service.

Snack counts were not correctly consolidated (systemic math errors) for the monthly claim (area-eligible and non-area eligible sites) to DPI. Like the NSLP and SBP this is a systemic issue and the difference (under or over claim) will be taken back to the beginning of the school year.

**Finding #1:** Systemic inaccuracy in claim consolidation.

**Corrective Action:** Submit March's ASP claim for area-eligible and non-area eligible sites with supporting source daily software counts used to arrive at the claim. Technical assistance was provided to use edit check report for ease in claim consolidation. ASP does not require an edit check, but this reports seems to be the cleanest summary of daily counts.

**Finding #2:** Production records are incomplete or missing required information.

**Corrective Action:** Submit one weeks' worth of future (March or April) afterschool snack menus and production records. The production records at a minimum should include the portion size, amount available, amount used, and the amount leftover. If there is a product substitution- the change in item must be documented on the production records.

TA was provided onsite, to assist in developing the cycle menu template further to capture more detailed information on the sites' current menu/production records.

**Finding #3:** Labels and or crediting documentation was not provided to support all the items menued during the review period (Jan 11-15).

**Corrective Action:** Obtain crediting documentation to support how the following items credit as at least one full grain component (1 oz eq); or, remove items from menu/ replace with compliant products:

- Baked Cheetos
- Giant Goldfish Cracker

Note: The Simply Chex Strawberry was credited using General Mills online PFS database. The link can be found here: <http://www.generalmillscf.com/industries/k12/support-tool-categories/exploring-products/grain-guide-letter> . Crediting documentation should be maintained for all products menued and not just the products that were audited as part of the AR process.

## F. Other Programs

### Fresh Fruit and Vegetable Program

#### Commendations:

The district is doing a great job streamlining the program for the district by assisting schools with tracking their expenses and by completing monthly claims. Additional steps will need to be taken to bring the costs claimed for reimbursement into compliance with grant regulations, which will require a team effort between the RDN, the FSD, and the individual schools. At the time of review, RDN was already implementing a few changes to increase program accountability, including verifying orders and substitutions with the participating schools. Thank you to all for your efforts in promoting the program in the district and getting students excited about fresh fruits and vegetables.

#### Technical Assistance:

- Refer to USDA memo SP 33-2012, "Fresh Fruit and Vegetable Program Fees in FSMC Contracts," available at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-33-2012.pdf>. This memo provides language related to the responsibilities a FSMC has when contracted for FFVP and responsibilities the SFA has. The summary is that the FSMC needs to document and track FFVP expenses separately from other expenses and make that documentation accessible to the SFA. The SFA in turn needs to review the documentation and ensure program cost guidelines are being met. A few other highlights are below.
  - o Costs reported by the SFA for reimbursement from the grant must be allowable, actual costs, and fully documented.
  - o The SFA must carefully assess all contractual provisions allowing the FSMC to charge costs other than actual costs of fresh fruits and vegetables. The purpose is to ensure adherence to the cost limitations placed on the FFVP (i.e., the requirement that administrative costs not exceed 10% of the overall grant).
  - o A SFA must ensure contracts with FSMCs require the FSMC to provide full documentation of allowable costs.
  - o If the FSMC is unable or unwilling to provide this information, the SFA has two choices: it must consider either running the FFVP separately from its existing FSMC or relinquish its grant funding.
- To simplify the ordering and delivering aspect of the program, consider working with participating schools to develop a district FFVP menu so that the schools are receiving the same snack items on the same day. There may be an opportunity to also coordinate nutrition education efforts with participating schools if they are serving the same snacks on the same days. In addition, having a standard menu helps prevent situations where a school does not order certain items due to perceived student or teacher preferences.
- Note that Horace Mann currently has \$624 budgeted in allocation B for non-food items. Since Horace Mann is not being charged a delivery fee for snacks, consider submitting a budget revision to move the \$624 from non-food items to fruits and vegetables.

**Finding #1:** The costs charged to the grant for fruits and vegetables were not actual costs. Instead, the school ordered fruits and vegetables based on a list that provided an average cost. The claim was then prepared based on these average costs and what the school ordered, rather than what the school received. In October, substitutions were not being tracked or claimed appropriately. Based on the documentation available for review, the fiscal over-claim for Pershing Elementary came to \$119.26.

**Corrective Action:** Moving forward, a new system for ordering and tracking expenses will need to be developed to ensure that only actual costs for snacks served at the schools are being claimed. This will require Sodexo to make actual invoice data available to the district. Before the January 2016 claim is paid by the DPI, it will need to be validated for all participating sites. To do so, please submit a written statement to the PHN detailing the steps taken to ensure only actual costs are claimed and provide copies of all January 2016 FFVP invoices.

## G. Records Retention

- CEP SFAs must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition, this documentation must be retained for three years after the submission of the final claim for reimbursement for the last fiscal year of CEP.

**Note:** Records used in the development of the ISP may include the following: DPI approval letter, signed agreement, eligibility worksheet, direct certification run files used to establish identified students, April 1 student roster, supporting documents for extension of benefits, homeless liaison or head start lists, etc.).

- Records requested throughout the onsite review were not easily accessible (e.g., documents to support the monthly claim, food safety inspection reports, crediting documents for the snack program).

As discussed at the exit conference, it is understood that prompt corrective action is required for the findings identified above. 7 CFR 210.18 requires fiscal action to be calculated for critical violations to reclaim unearned reimbursement. In addition, withholding of program payments is required if documentation of corrective action is not received within 30 days of the date negotiated at the exit conference, or as later extended upon written request if extraordinary circumstances delay completion of corrective action within the originally negotiated time frame. Uncorrected errors are subject to reclaim for the entire school year.



# USDA Child Nutrition Programs Administrative Review (AR) Follow-up Summary Report

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**School Food Authority:** West Allis School District

**Agency Code:** 40-6300

**Review Period:** March 2017

**Review Date(s):** 5/16-17/17

**Date of Exit Conference:** 5/17/17

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

*Due to the significance of repeated Critical and General Area violations during the SY 2015-16 AR, a follow-up review was conducted in Meal Counting and Claiming, Food Safety, and Smart Snacks. The outcome of the review is outlined below.*

*Black text: SY 2015-16 Findings, Corrective Action, and Fiscal Outcomes*

*Red text: SY 2016-17 Follow-up Review Findings and Corrective Action Needed*

## **SY 2015-16 Administrative Review Finding**

### **Counting and Claiming**

**Finding #4:** The January 2016 National School Lunch Program (NSLP) and Severe Need School Breakfast (SBP-SN) claim revealed discrepancies during consolidation at the district level. Total counts from the site based edit check reports were compared against the SFA submitted total counts. The counts the school used for the claim were taken from an Infinite Campus transaction summary report (non-CEP sites) and from a combination of detailed reports and an external Sodexo report (CEP sites). CEP site total daily counts were not added together correctly and thus resulted in discrepancies. The claiming percentages used were the most current; however, the daily totals were not accurate p/t applying the claiming percentages.

\*The auditor and SFA noted discrepancies in counts reported on the edit check, transaction summary report, and detailed report. Continue working with Infinite Campus to resolve the discrepancy between reports. For audit purposes, accurate counts will be obtained off of the edit check reports per SA guidance.

**Corrective Action:** Follow USDA prescribed procedures for consolidating claims by completing the edit check by site. Evaluate any daily counts that exceed attendance adjusted eligible and correct any count errors prior to consolidating edit check counts for each of the schools that are submitted on the one monthly claim.

- Submit March's NSLP, SBP, and SBP-SN claim online. Email supporting site based edit check reports to the NPC. All sites should use the software edit check report except for the CEP Elementary Schools. These will need to be recorded on the CEP manual edit check form <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/cep-editcheck.xlsx> because the daily counts do not pull into the edit check report. This process must happen each month prior to online claim submission to DPI.
- School consolidated edit check counts for September – December 2015 were obtained onsite. **Fiscal action will be taken back to the beginning of the school year to make appropriate count adjustments and determine if there was an over or under claim.**

**Fiscal Action Outcomes:** The Department of Public Instruction (DPI) has determined that the total reclaim amount is \$6,835.57. The reclaim is broken down as \$3,873.87 for NSLP, -\$995.05 for Afterschool Snack, \$119.26 for FFVP (FFVP), and \$3,837.49 for SBP and SBP-SN.

### **SY 2016-17 Follow-up Review Results**

**Finding #4:** The district has greatly improved their claiming system by running the site- based edit checks but continues to have systemically inaccurate consolidated claims for the National School Lunch Program (NSLP) and Severe Need Breakfast Program (SBP-SN). A non-systemic error was also found in the review period for the Area-Eligible Afterschool Snack Program (ASP-AE). No errors were found in the review period for the Non-Area eligible Afterschool Snack Program (ASP). The claiming errors are likely stemming from the transfer of edit check counts to a consolidated excel spreadsheet template and then to a Sodexo report. The Sodexo report is being used to submit the consolidated claims in the DPI online claim portal. Furthermore, the district is not reviewing and signing off on claims prior to submission as required, which could have prevented these errors.

Fiscal action will be applied back to the beginning of the 2016-17 SY for NSLP and SBP-SN between the SFA and SA counts. Fiscal action will also apply the non-systemic ASP-AE errors for the month of March. Furthermore, a separate error in applying the correct free and paid CEP claiming percentages at Lincoln Intermediate contributed to the discrepancies for the months of October-December. Corrections for these errors will be accounted for within the follow-up review fiscal action workbook as these corrections were not processed offsite prior to the onsite review.

**Corrective Action:** Submit copies of the April 2017 consolidated DPI online claim forms for the NSLP, SBP-SN, SBP, ASP, and ASP-AE along with corresponding site-based edit checks to support the meals/snacks claimed.

#### September 2016 Claim Exception Plan:

The district clarified that the September 2016 claim exception request was for all programs and submitted the paper claims through the DPI accountant on 5/17/17. These claims will be processed, however, any discrepancies between the SA audited counts and the SFA counts will be included in the fiscal action workbook.

*Reminder:* This exception may only be used once every 36-mos./3-yrs. per program. If the district should happen to be late with a claim for any of these programs during that time-period, they would forgo reimbursement.

### **SY 2015-16 Administrative Review Finding**

**Finding #7:** Shared Journeys is a recognized school by DPI and participates in breakfast only. Students are dual enrolled as part of this Charter school and a home high school within the district. The students eat lunch at their home school, which is where those meals are counted. Currently, breakfast meals are being manually tracked back to their home high school even though they did not eat there. Also, there are Severe Need Breakfast counts incorrectly entered in the contract even though these students do not eat lunch at Shared Journeys.

**Corrective Action:** Track Breakfast counts separately for Shared Journeys. Remove SNB counts from contract and change participation from Severe to Regular Breakfast. Moving forward the district will now report a total of 2 Regular Breakfast programs. Shared Journeys will not be SNBP or CEP eligible at this time b/c they do not offer a separate lunch program.

### **SY 2016-17 Follow-up Review Results**

**Finding #7:** The agency is not in full compliance. Shared Journeys breakfast counts are now tracked separately, but these meals were incorrectly claimed at the severe need rate (SBP-SN), rather than at the regular breakfast rate (SBP) resulting in an overpayment. Fiscal Action will be taken on Shared Journeys breakfast meals for the months of October- March during SY 2016-17. The September 2016 claim was filed under the regular breakfast program during the onsite follow-up review.

**Corrective Action:** Submit a copy of the April 2017 DPI online claim form for the regular School Breakfast Program (SBP) along with the corresponding edit check to support the meals claimed.

### **SY 2015-16 Administrative Review Finding**

**Finding #5:** The SFA is not reviewing monthly edit check reports and signing off on the claim for accuracy p/t submission to the DPI office. Note: Sign-off and review of the edit check reports cannot be done by the FSMC.

**Corrective Action:** Review edit check reports for the district monthly and sign off; retain for records. Begin this process as of March and moving forward.

### **SY 2016-17 Follow-up Review Results**

**Finding #5:** The district is not reviewing the monthly edit check reports and signing off on the claim for accuracy prior to submission to the DPI. Note: Sign-off and review of the edit check reports cannot be done by the Food Service Management Company (FSMC).

**Correction Action: Corrective Action:** Submit an email statement outlining how the district will ensure all monthly edit checks and claims are reviewed by district personnel prior to submission. If this task is assigned to new personnel, ensure that they are trained on how to review the edit checks and that they sign-off (document) their review each month.

## **SY 2015-16 Administrative Review Finding**

### **General Program Compliance**

#### **Food Safety**

**Finding #3:** (1) The most recent food safety inspection reports were obtained from the West Allis Health Department during the on-site portion of the review for the review sites. However, the reports from the previous school year were not available to document if two inspections were completed/requests were made for the previous school year. In addition, there was no documentation to show that attention was given to resolve Wisconsin Food Code compliance issues. The district could not document the number of food safety inspections reported for each school on Schedule A of the on-line contract.

(2) The May 14, 2015 inspection report was posted in a publicly visible location at Lane Intermediate School. The posting requirement was not met at Pershing Elementary and Nathan Hale High Schools. The inspection report was taken down by a teacher at Pershing Elementary School to free up the school bulletin board for a display. The food service supervisor at Nathan Hale High School was not aware of the posting requirement.

#### **Corrective Action:**

- Request 2 inspections from the West Allis Health Department if one or more schools are not receiving required number of food safety inspections.
- Accurately report/update the number of inspections for each school site on the DPI online contract

## **SY 2016-17 Follow-up Review Results**

The district is now in compliance. Two inspections have been requested and the agency is maintaining proper documentation.

#### **Smart Snacks in Schools**

## **SY 2015-16 Administrative Review Finding**

**Finding #1:** There was no documentation to show a la carte items were evaluated for compliance with Smart Snacks standards. Proper documentation includes nutrition fact labels from products and Alliance for Healthier Generation Calculator print outs. Resources for schools are available at DPI's webpage: [http://fns.dpi.wi.gov/fns\\_smartsnacks](http://fns.dpi.wi.gov/fns_smartsnacks) and at USDA's Smart Snacks webpage: <http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks>. Several items available for sale on the serving line and separate a la carte sale area were not compliant when entered into the calculator during meal observations at Nathan Hale High School.

\*Additional *Summary of Observations Document* provided during exit along with the Smart Snacks in a Nutshell handout.

**Corrective Action:** Use Alliance for Healthier Generation Calculator to determine what existing food and beverages sold a la carte are compliant. Indicate in response intentions regarding evaluating all a la carte products, keeping necessary documentation, using up inventories of non-compliant products,

and purchasing those products that are compliant. Submit copy of Alliance for Healthier Generation Calculator printouts for **Nathan Hale and Lane Intermediate** and update the list of compliant a la carte items to support corrective action.

### **SY 2016-17 Follow-up Review Results**

The district is now in compliance. A comprehensive Smart Snacks binder was created and the products evaluated using the Alliance for Healthier Generation Calculator. Print outs are retained. Students have a wide-variety of Smart Snacks compliant foods and beverages at Nathan Hale High School.

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Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage [dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017).



