

Administrative Review Report

Stevens Point School District - 495607

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/24/2019	03/04/2019
On-Site Review	04/01/2019	04/05/2019
Site Selection Worksheet	01/24/2019	02/08/2019
Entrance Conference	04/01/2019	04/01/2019
Exit Conference	04/04/2019	04/04/2019

Commendations:

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

The staff members did an excellent job preparing for the review, and were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the nutrition programs. The food service staff were welcoming, knowledgeable, and clearly dedicated to their work. The cafeteria was inviting and interactions between staff and students during meal times were positive and customer-service focused.

The district has a very active wellness committee that meets regularly. Excellent records are kept pertaining to these wellness meetings and the policy is currently being updated. It is clear that there is a school and community emphasis on wellness.

The district and food service director did an excellent job promoting their Summer Food Service Program. The director stated that the program has grown over recent years and that the program structure helps feed a large number of students. Great job implementing a program that helps students have access to healthy meals during the summer!

The determining official is newer to the role and does a great job managing free/reduced information. There was only one error out of the 525 student eligibility statuses reviewed, which is a very low error percentage. The official has attended trainings and seeks out opportunities to learn more about the free/reduced benefit management. Keep up the good work!

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Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/03/2019 04:54 PM</p>	<p>Finding: On the Annual Financial Report, expenses were allocated to each program based a percentage of revenues instead of actual expenses incurred by each program.</p> <p>CA: Submit a detailed statement describing how expenses will be accurately allocated to each program going forward-- this must be for all programs. The food service director and finance manager should both watch the AFR webcast on the Training webpage to gain a basic understanding of AFR requirements (https://dpi.wi.gov/school-nutrition/training/webcasts). Submit a statement verifying the webcast was completed. Please also take the time to review the resources on the Financial Management webpage for directions and tools that can assist in proper allocations for the AFR (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/03/2019 04:31 PM</p>	<p>Finding: The SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p>CA: Using data from the current school year, complete the DPI Nonprogram Foods Revenue Tool or the USDA Tool and upload into SNACS. Please reference the resources on the Financial Management webpage for directions and tools that can assist in completion of the tool (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	

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TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/03/2019 04:07 PM</p>	<p>Finding: One income application was processed incorrectly, as the reported child income was not included in the calculation. The omission of this income resulted in an incorrect reduced benefit determination. The household should have been paid, when including all reported income as is required. This error affected two students; one in the review sample, and one outside of the review sample.</p> <p>CA: During the on-site review, the determining official sent the household an adverse action letter. After the required ten calendar days from the date the letter was sent, change the meal benefit status for both students from reduced to paid. <i>No further action required.</i></p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	133	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/03/2019 04:12 PM</p>	<p>Finding: Two students on the benefit issuance had effective dates from prior school years and did not have approved benefit eligibility documentation for the current school year. It appeared that these two students had benefits via direct certification extension in prior school years, and did not properly drop-off at the end of the 2018-19 carryover.</p> <p>CA: During the on-site review, the determining official sent the households an adverse action letter. After the required ten calendar days from the date the letter was sent, change the meal benefit status for both students from free to paid. <i>No further action required.</i></p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	138	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/04/2019 11:34 AM</p>	<p>Finding: There were several students on the benefit issuance list with effective dates from prior school years. These students did have documentation on file to support their</p>

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		<p>2018-19 benefits, despite the incorrect effective dates. The effective date issue appeared to be the result of incorrect discontinuation of carryover and recertification of benefits for 2018-19 for some students with benefits established via direct certification extension.</p> <p>CA: The determining official has been working with the software vendor to correct the dates and prevent this issue in the future. Please submit a statement describing the steps that will be taken in future school years to ensure effective dates and carryover are implemented correctly.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	209	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/04/2019 11:26 AM</p>	<p>Finding: The SFA used Alternate 2 sampling method, but did not properly select the number of required error prone applications. Additionally, one of the verified applications was incorrectly reported on the verification collection report--it was recorded as "reduced, responded changed to paid," but should have been "reduced NOT responded changed to paid."</p> <p>CA: It is recommended to review the Eligibility Manual and/or watch the verification webcast (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf; https://dpi.wi.gov/school-nutrition/training/webcasts). Submit a statement describing how verification will be completed correctly going forward. Please be specific regarding how error prone applications will be identified and selected.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	211	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/03/2019 04:01 PM</p>	<p>Finding: The verification notification letter did not contain all required information.</p>

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		<p>CA: Review the Household Notification of Selection section of the Eligibility Manual (pg 105-106; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf). Revise the letter used and upload an updated version of the SFA's verification notification letter into SNACS for approval. It may be helpful to reference the DPI "We Must Check" verification letter template (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-we-must-check.docx).</p>
Site Name		
Form Name	Meal Counting and Claiming (314 - 316)	
Question #	314	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/03/2019 04:29 PM</p>	<p>Finding: The data entered in the online contract for Kennedy Elementary School's severe need breakfast (SNB) qualification was incorrect and was not supported by point of service documentation. A typo in the entry of the number of reduced lunches served resulted in an incorrect qualifying percentage. When the correct values were used, the school was below the required 40% qualifying cut-off. SNB reimbursements have been improperly paid for Kennedy since the beginning of the school year as a result.</p> <p>CA: Funds paid in excess of the amount of breakfast reimbursement Kennedy is eligible for will be reclaimed for the school year thus far. The food service director has taken steps to correct the severe and non-severe need breakfast claim spreadsheets for every month in 2018-19 for which Kennedy was incorrectly claimed for severe need breakfast—these have been submitted to the consultant.</p> <p>When directed by the consultant to do so, update the online contract to reflect that Kennedy is in non-severe need breakfast on Schedule A School Information and Schedule A Policy Statement, and adjust the site counts for severe vs non-severe need breakfast on the SFA Policy Statement. Please do not update the contract until notified by the consultant to do so.</p>
Site Name	Point of Discovery School	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	317	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/02/2019 08:09 AM	<p>Finding: The SFA is not in compliance with non-discrimination requirements per 7 CFR 245.8. Prices for student meals were visible on the computer screen at the point of service (POS) that could potentially be seen by students which constitutes overt identification.</p> <p>CA: While on-site, the computer settings were modified to hide the meal prices and show only that one lunch was served. <i>No further action required.</i></p>
Site Name	Point of Discovery School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	406	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/03/2019 01:18 PM	<p>Finding: Meal service at PODS is not structured to comply with age/grade group meal pattern requirements. Additionally, production records do not indicate that both 6-8 and 9-12 students are served (only 9-12 is listed).</p> <p>CA: Update and submit a production record template that shows separated age/grade groups. If unable to create a template in the nutrient analysis software by the CA due date, submit a statement that says you will use two production record templates in the interim (one for 6-8 and one for 9-12) in order to show serving sizes for each grade group. Additionally, submit a statement that explains what will be done in order to separate the age grade groups during meal service to ensure the correct meal pattern is served.</p>
Site Name	Point of Discovery School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/02/2019 02:40 PM	<p>Finding: The English muffin served at breakfast at PODS was not whole grain-rich.</p> <p>CA: Corrected prior to on-site review. The food service director sent a compliant label for a whole grain-rich replacement product. <i>No further corrective action required.</i></p>

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Site Name	Point of Discovery School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/03/2019 08:46 AM	<p>Finding: Daily grain shortage and weekly grain shortage for 9-12 students at Point of Discovery for the week of review. Fiscal action is required for select repeat violations found during an Administrative Review (AR). Because daily and weekly grain shortages were found during the last AR as well as the current AR, fiscal action will be applied. There will be a re-claim for the number of meals that contained the daily grain shortage served on Wednesday, February 20th.</p> <p>CA: Submit a statement explaining how the daily grain shortage will be fixed for the week of review. By meeting the daily grain requirement the weekly grain requirement will also be met.</p>
Site Name	Point of Discovery School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/03/2019 08:51 AM	<p>Finding: Sausage, egg and cheese English muffin breakfast sandwich was not standardized. The sausage listed in the recipe is not the sausage product that was actually used.</p> <p>CA: Create and submit a standardized recipe for this breakfast sandwich, ensuring that ingredients and instructions reflect actual kitchen practices.</p>
Site Name	Jefferson Elementary School	
Form Name	Wisconsin School Day Milk Program	
Question #	4	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/04/2019 11:50 AM	<p>Finding: Observation, discussions with staff members, and review of roster check off sheets indicated that all teachers responsible for keeping point of service (POS) records are not</p>

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	<p>adhering to proper POS procedures. In some cases, teachers mark off students in the morning before milk is served, students independently grab milk from the cooler and go back to the classroom to check their name off in the software system, and it appeared that some teachers pre-check student names on rosters and then cross them off if milk is not served (i.e. if school was cancelled for a snow day.)</p> <p>CA: Submit a description of how POS expectations for WSDMP will be communicated to those involved in program implementation. Please be specific and include any documents that will be sent out to school staff members as reminders of POS requirements.</p>
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Site Name	
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1403
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 04/11/2019 02:30 PM</p> <p>Finding: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American Non-Compliant Product List or SFA equivalent:</p> <ul style="list-style-type: none"> • Canned sliced jalapenos - Mexico • Bananas - Guatemala • Trio chicken and gravy mix - Canada • Refrigerated tomatoes - Mexico <p>CA: Complete and submit Non-Compliant Product Forms for the products listed above (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site
04/08/2019	441	709	Administrative Review	ALL
Comments				
<ul style="list-style-type: none"> • Non-program foods include: adult meals, a la carte, extra entrees, extra milk (for cold lunch or milk break), vended meals (meals sold to other agencies), catering, and food service operated vending machines. • All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in 				Created Date 4/8/2019 9:27:31 AM

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<p>the negative unless non-federal funds are transferred into the food service fund to cover the deficit.</p> <ul style="list-style-type: none"> • Non-program food costs and revenues must be separated from program food costs and revenues. • Since non-program foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods. • The USDA Non-Program Revenue Tool must be completed yearly, at a minimum. The DPI Non-Program Food Revenue Tool/Calculator located on the Financial Management website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx). $\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$				
04/08/2019	440	701	Administrative Review	ALL
Comments				
				Created Date
<p>The SFA had an excess cash balance (ECB) at the end of 2017-18. A spend-down plan will need to be submitted to DPI in response to the letter that will be sent out by DPI in the next few weeks. Below are several ideas for ways to spend down the ECB:</p> <ul style="list-style-type: none"> ○ Provide reduced eligible students with free meals. See USDA Memo SP 17-2014. ○ Improve quality and variety of foods offered. ○ Increase marketing of the school meal program to increase participation. ○ Purchase additional or updated kitchen equipment if needed. Please note that Section 210.04(a) of the regulations prohibits school food service revenues from being utilized to purchase land or buildings or to construct buildings. ○ Provide additional training to staff, which can include sending staff to conferences on school nutrition related topics. ○ Offer more local products or start a Farm to School program. ○ Carryover of the funds to be expended in the next school year or long range planning for the improvement of the school food service under a plan approved by the School Nutrition Team (SNT). 				4/8/2019 9:26:33 AM
04/08/2019	439	700	Administrative Review	ALL
Comments				
				Created Date
<ul style="list-style-type: none"> • The annual financial report (AFR) requires correction, as described in the corresponding corrective action. All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program--this will aid the school in calculating its "yearly" reference period for non-program food compliance which is highly recommended. • The Annual Financial Report instructions and other resources are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf). In addition to the AFR instructions, the AFR In a Nutshell, AFR webcast, Expenditure Categories for the Food Service AFR, and Allocation Tool should be explored. 				4/8/2019 9:24:29 AM

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04/08/2019	438	1	Administrative Review	Jefferson Elementary School (applicable district-wide for WSDMP)
Comments				
				Created Date
In some of the schools, milk coolers for WSDMP/"milk break" are located in the hallways outside of the cafeteria. Students and teachers can access the milk coolers during the day to get milk for milk break and the coolers are locked up at night. The food service staff is responsible for stocking, inventory, and temperature monitoring of these milk coolers. Consider ways to improve the security of these coolers during the day to protect against spoilage, theft, or other loss.				4/8/2019 9:19:15 AM
04/08/2019	437	4	Administrative Review	Jefferson Elementary School (applicable district-wide for WSDMP)
Comments				
				Created Date
Counts used for reimbursement claims (including for WSDMP) must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal. Using morning attendance, milk counts taken prior to service (including pre-checking students on the roster for the day, week, or month) and counting based on the number students that do <u>not</u> take milk are not acceptable. In these methods, there is room for error if students order but do not take their milk, leave school before service time, or other such discrepancies. Please also note that students may not be responsible for their own POS—adults trained on program requirements must hold responsibility for POS check-offs. Please reference the WSDMP FAQ (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf).				4/8/2019 9:16:10 AM
04/08/2019	436	7	Administrative Review	Jefferson Elementary School (applicable district-wide for WSDMP)
Comments				
				Created Date
The SFA has been using the simple average for cost per half pint of milk on the claim. Going forward, the weighted average price per half pint should be used instead of the simple average for the most accurate calculation.				4/8/2019 9:09:17 AM
04/08/2019	435	4	Administrative Review	Jefferson Elementary School (applicable district-wide for WSDMP)
Comments				
				Created Date
The WSDMP claim submitted in June 2018 reflected an underclaim when compared to the 2017-18 POS records. One check-off roster for one month at one school was not incorporated into the final claim total. It is recommended to establish some type of internal edit check or double-check process to prevent underclaiming in the future.				4/8/2019 9:06:08 AM

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04/08/2019	434	2	Administrative Review	Jefferson Elementary School (applicable district-wide for WSDMP)
Comments				Created Date
The SFA currently charges a flat rate for paid students that want milk at a "milk break" at the start of each semester. While this practice is allowable, students that are absent or elect not to take their pre-paid milk on certain days would end up paying more per unit than other students. In the future, the SFA could consider charging paid students per half pint of milk taken instead of a flat fee upfront.				4/8/2019 9:03:42 AM
04/08/2019	433	306	Administrative Review	ALL
Comments				Created Date
The enrollment number on the claims for each meal at each school should reflect the number of students enrolled at that site with access to the meal. Please work with the appropriate staff members and software reps to ensure the reports being used for enrollment reporting on claims is accurate as described above. When run correctly, the edit check report from the POS software should provide an accurate enrollment number. The enrollment number reported for PJ Jacobs (school code 240) on the claim did not match the enrollment number on the software-generated edit check. This discrepancy should be further investigated to ensure accuracy going forward.				4/8/2019 8:45:14 AM
04/08/2019	432	120	Administrative Review	ALL
Comments				Created Date
USDA Food and Nutrition Services (FNS) strongly encourages LEAs to promptly accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs. DPI requires source documentation of the student's previous eligibility, which means that the information originally used to determine the student's meal eligibility at the prior LEA is shared with the new LEA. This may include a copy of the original application or a copy of a DC run with the student's name listed.				4/8/2019 8:31:38 AM
04/08/2019	431	133	Administrative Review	ALL
Comments				Created Date
A child's eligibility for free benefits under Other Source Categorical Eligibility (i.e. homeless, Head Start, migrant, runaway, foster) does not extend to any other child in the household. Each child in a household must have their own other source categorical eligibility established annually by the appropriate school officials. See pages 18, 34, and 37 of the Eligibility Manual for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).				4/8/2019 8:29:58 AM

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04/08/2019	430	132	Administrative Review	ALL
Comments				
				Created Date
<p>Because the effective date for establishing other source categorical eligibility (i.e. homeless, migrant, Head Start, runaway, foster) is the date the determining official is notified by the appropriate official of the students' status, a reliable and timely communication system between officials is crucial. To avoid lapses in student meal benefits, the determining official and appropriate district officials (e.g. homeless liaison, migrant coordinator) should have a well-established and timely method for communicating this information. This could be in the form of exchanging paperwork, email communication, use of an electronic shared document, or other reliable method. Please continue working on streamlining this communication process to minimize any lapses in student meal benefit eligibility.</p>				4/8/2019 8:25:30 AM
04/08/2019	429	113	Administrative Review	ALL
Comments				
				Created Date
<p>For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, a Disclosure Agreement form should be signed and on file at the district. A template Disclosure of Free and Reduced-Price Information form is located on the SNT website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement-school-staff.docx). This would include school secretaries that receive completed fee waiver forms that allow free/reduced information to be used for waiving specific fees.</p>				4/8/2019 8:17:43 AM
04/08/2019	428	106	Administrative Review	ALL
Comments				
				Created Date
<p>Access to students' free/reduced status, income application, or other benefits information should be restricted to those staff members with a "need-to-know" for program purposes. Cashiers, supervisors, or other school staff members that do not need this information to perform their job duties directly related to NSLP administration should not have access to it.</p>				4/8/2019 8:15:20 AM
04/08/2019	427	105	Administrative Review	ALL
Comments				
				Created Date
<p>Eligibility effective dates are the date an application is approved, the date of the DC run the student matches on, the date a benefit extension is identified, or the date the determining official is notified by the appropriate school official (e.g. homeless liaison or migrant coordinator) that a student is homeless, migrant, runaway, or enrolled in Head Start. Backdating of eligibility is not allowable.</p>				4/8/2019 8:11:32 AM

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04/08/2019	426	103	Administrative Review	ALL
Comments				
				Created Date
<p>The benefits issuance list showed effective dates for several students from previous school years. Most of these students did have benefits established by direct certification (DC) extension for the current school year, despite the incorrect effective dates. Students must have new eligibility statuses established each school year, and the effective dates in the software system must reflect this. The determining official should continue working with the software vendor to ensure correct carryover drop-off for all students and correct effective dates for students with DC extension benefits carried over from the previous school year.</p>				4/8/2019 8:09:12 AM
04/08/2019	425	103	Administrative Review	ALL
Comments				
				Created Date
<p>During carryover, a child's benefit eligibility from the previous school year is valid for up to 30 operating days into the current school year or until a new determination is made--whichever comes first. Adverse action (which requires 10 days advance notice and appeal rights when a benefit is decreased) does not apply during carryover. The SFA may choose to give the household a few days (suggested no more than 5 days) to get money into their account before reducing the benefit, however this is not required. A new eligibility status determined during carryover can be implemented immediately (without a grace period), even if the new determination is a decrease from the previous year's carried over benefit since this is not considered adverse action. Please see pages 46-47, 50, 54, and 57 of the Eligibility Manual for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).</p>				4/8/2019 8:04:23 AM
04/08/2019	424	211	Administrative Review	ALL
Comments				
				Created Date
<p>The verification results letter ("We HAVE Checked letter) met the minimum requirements, but could be improved upon. The SFA's letter could more clearly communicate the 10 calendar days that will be given before a benefit will be decreased as a result of verification (when applicable). The information regarding a hearing request could also be made clearer. It is recommended to review the current template letter used and compare to the DPI template letter (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-we-have-checked.docx). Please see pages 113-114 of the Eligibility Manual for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).</p>				4/8/2019 7:50:35 AM
04/04/2019	418	129	Administrative Review	ALL
Comments				
				Created Date

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<p>The household communication letters for application approval/denial and direct certification (DC) approval meet requirements but could be improved upon. For the DC letter, it was suggested to the determining official to list all DC programs, advise that Z code matches could be free by application, and elaborate on DC extension of benefits. For the application approval/denial letter, it was suggested to remove the decline of benefits option and add FDPIR information. It is recommended to review the DPI template letters and modify the SFA's templates accordingly (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#notification-letters). Please see pages 52 and 69 of the Eligibility Manual for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).</p>					4/4/2019 12:02:18 PM
04/03/2019	406	1007	Administrative Review	ALL	
Comments					
				Created Date	
<p>The local wellness policy that is under revision contains all of the required content areas, however several improvements are recommended. It is recommended to add additional nutrition promotion information, specifically regarding Smarter Lunchrooms. Additional language regarding the triennial assessment of the policy could also be included. Finally, specific and measurable goals should also be a core part of the policy.</p> <ul style="list-style-type: none"> o Please refer to the USDA summary of the requirements for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). o USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources). o Wisconsin Team Nutrition has several wellness policy resources available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy). 				4/4/2019 11:53:09 AM	
04/04/2019	416	1007	Administrative Review	ALL	
Comments					
				Created Date	
<p>SFAs must assess the LWP every three years, at a minimum--this is referred to as the "triennial assessment." The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. It must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results and when it took place.</p>				4/4/2019 11:52:45 AM	
04/04/2019	417	1007	Administrative Review	ALL	
Comments					
				Created Date	

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After completion of the triennial assessment, SFAs are required to inform and update the public about the results. SFAs must retain a copy of the assessment and documentation related to the public notification. The public notification may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.					4/3/2019 3:06:25 PM
04/03/2019	405	1408	Administrative Review	Point of Discovery School	
Comments					
					Created Date
Many of the temperature logs had the same temperatures listed for every day throughout the month. It is highly unlikely that the temperatures taken for equipment (cooler, freezers, dishwashers) would be exactly the same temperature every day. It is recommended to review temperature-taking and recording procedures at the school to ensure that accurate temperatures are taken for each piece of equipment daily.					4/3/2019 2:55:39 PM
04/03/2019	404	214	Administrative Review	ALL	
Comments					
					Created Date
On the verification collection report (VCR), the results from one of the verified applications were reported incorrectly in section 5-8. The household submitted inaccurate income information and did not reply to the SFA's follow-up requests with the correct information. Failure to submit adequate verification documents is considered a non-response and should be indicated as such on the VCR. This non-response results in a 33% non-response rate for the SFA, thus requiring standard sampling next year.					4/3/2019 2:52:18 PM
04/02/2019	396	1403	Administrative Review	ALL	
Comments					
					Created Date
<ul style="list-style-type: none"> • The Buy American provision was added to the National School Lunch Act (NSLA) by Section 104(d) of the William F. Goodling Child Nutrition Reauthorization Act of 1998 (Public Law 105-336). Section 12(n) to the NSLA (42 USC 1760(n)), requiring school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product. • A "Domestic Commodity or Product" is defined as an agricultural commodity or product that is produced or processed in the United States using substantial agricultural commodities that are produced in the United States. • "Substantial" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. • Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States. • The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs. 					4/2/2019 2:51:43 PM

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- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted in an email. Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- The following information must be recorded on a Buy American Non-Compliant Product List. *Note:* In reference the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.
- When completing the [Buy American Non-Compliant Product list](#) there are 4 pieces of information that must be recorded:
 1. Date
 2. Name of product
 3. Country of origin
 4. Reason
 - a. **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
 - i. *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
 - b. **Seasonality**- Product(s) is not available domestically during certain times of the year. (*SFA is required to record or list the months that the domestic product is not available.*)
 - i. *Ex. Blueberries are not available domestically during the months of December – June.*
 - c. **Availability** – Product(s) is not available to purchase domestically.
 - i. *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
 - d. **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
 - i. *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
 - e. **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - i. *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
 - f. **Other**- Please provide a written explanation.
 - i. *Ex. The SFA received a donation of non-domestic oranges*
 - ii. *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

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Date	ID	Grade	Review Type	School
04/02/2019	395	404	Administrative Review	Point of Discovery School
Comments				
				Created Date
<ul style="list-style-type: none"> • Breakfast and lunch signage was posted at PODS and filled in with the daily menu. However, breakfast signage did not specify the number of food items that each menu item was planned as nor the number of items from each component that students could select. Technical assistance was provided and the menu was updated to include all of the day's offerings, including the correct number of items. • It is up to the menu planner to determine in advance whether items crediting as 2.0 ounce equivalents (oz eq) count as one or two food items. He or she must clearly communicate to students (and point of service staff) what foods they can (must) select in order to have three food items for a reimbursable breakfast. For example, the pizza served at breakfast on the day of observation was 2.0 oz eq, so it could be counted as either one or two food items. • As a reminder, under Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered from the three components (grain [and optional meat/meat alternate], fruit/vegetable, and milk). An item is defined as 8 fluid ounces of milk; ½ cup of fruit and/or vegetable; and 1.0 ounce equivalent (oz eq) of grain (and optional meat/meat alternate). Visit the Breakfast Menu Planning webpage, under the OVS heading for additional guidance (https://dpi.wi.gov/school-nutrition/school-breakfast-program/menu-planning). • Refer to the DPI webcast on Get the Scoop on Breakfast: Part 3 (Menu Planning) that discusses how to fill out breakfast signage. • If you are interested in ordering signage from SNT, please visit the Team Nutrition webpage and complete the Resource Order Form, under the Resources heading (https://dpi.wi.gov/team-nutrition). 				4/2/2019 2:43:06 PM
04/02/2019	394	409	Administrative Review	Point of Discovery School
Comments				
				Created Date
<ul style="list-style-type: none"> • All grains offered and credited in school meal programs are required to be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. • For the week of review, a non-whole grain-rich English muffin was served at Point of Discovery. Reviewers discussed this with the food service director and the problem was corrected immediately by supplying the label of a new whole grain-rich English muffin that will be used. 				4/2/2019 2:32:21 PM
04/02/2019	393		Administrative Review	Washington Elementary

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Comments				
				Created Date
During meal preparation at Washington Elementary, the cupped canned peaches were weighed to confirm the portion size met the ½ cup requirement. The peaches weighed 3.4 ounces, equating to 3/8 cup per the USDA Food Buying Guide. It is recommended to switch from the 4 oz spoodle to the #8 scoop when measuring canned fruits to receive a more accurate volume.				4/2/2019 2:31:14 PM
04/02/2019	392	409	Administrative Review	Point of Discovery School
Comments				
				Created Date
<ul style="list-style-type: none"> On Production Records, the TRIO cheese sauce served with the pretzel is documented as crediting as 1.0 oz eq meat/meat alternate. Documentation from the manufacturer clarifies that product does not contribute toward child nutrition crediting. Please be aware that the cheese sauce should not be relied upon to credit as a meat/meat alternate. The homemade muffin is 2.5 oz (by weight). Using Exhibit A to calculate crediting, the muffin credits as 1.25 oz eq grain, not 2 oz eq grain as the recipe states. You would need to obtain a product formulation statement from the manufacturer of the muffin mix in order to determine if you could credit it for more using the amount of true grain in the mix. This discovery did not lead to any daily or weekly grain issues during the week of review. 				4/2/2019 2:29:25 PM
04/02/2019	391	409	Administrative Review	Point of Discovery School
Comments				
				Created Date
It is recommended for the planned menu at all schools to review the amount of grain offered on the menu. At Point of Discovery, sliced bread was offered as a side at both breakfast and lunch. A student selecting any of the entrees could also select the sliced bread. For the elementary schools, the maximum grains a student could select was 14 oz eq at lunch during the week of review. The recommended weekly maximum is 9 oz eq grains. At the elementary schools, a soft pretzel was served alongside the entree of chicken nuggets, sliced bread was served on nacho day, and a breadstick accompanied the pasta bake. If one or two of these additional grains were not offered or the crediting decreased (e.g., choose a 1 oz eq breadstick versus a 2 oz eq breadstick), then the weekly planned menu will be more in line in the intention of the meal pattern.				4/2/2019 2:21:07 PM
04/02/2019	390	409	Administrative Review	Point of Discovery School
Comments				
				Created Date
Recipes should be updated to reflect current practices and products. Recipe standardization ensures that each meal is consistently planned to meet the daily and weekly requirements. Technical assistance was provided for the recipe standardization process on the breakfast sausage, egg, and cheese sandwich. Currently the recipe lists a sausage patty from Advance Pierre, however, the school is using a Jimmy Dean sausage. This recipe must be updated to reflect current kitchen practices.				4/2/2019 2:00:46 PM

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04/02/2019	389	409	Administrative Review	Point of Discovery School
Comments				
				Created Date
Production records for Point of Discovery should reflect the grade grouping that are being served. Begin indicating on the production record template that both 6-8 and 9-12 are being served. Production record templates are generated in a nutrient analysis software, however, there is no option to create a two grade grouping template at this time. In order to decrease kitchen staff burden with filling out multiple production records (one for 6-8 and one for 9-12), if possible, work with the food management company to develop a two grade grouping production record that will include both the 6-8 and 9-12 grade groupings.				4/2/2019 1:59:56 PM
04/02/2019	388		Administrative Review	Point of Discovery School
Comments				
				Created Date
Reviewers observed many students throwing away whole fruit. To help remedy this, consider slicing the whole fruit so that students would be more likely to eat it.				4/2/2019 1:57:44 PM
04/02/2019	387	409	Administrative Review	Point of Discovery School
Comments				
				Created Date
Documentation from the week of review, February 18-22, 2019, was reviewed for meal pattern compliance at Jefferson Elementary, McKinley Center Elementary and Point of Discovery School (PODS). The results are listed below: <ul style="list-style-type: none"> ○ Jefferson Elementary - No meal pattern violations for both breakfast and lunch. ○ McKinley Center Elementary - No meal pattern violations for both breakfast and lunch. ○ Point of Discovery School - No meal pattern violations for breakfast. The following meal pattern violations were found for lunch: <ul style="list-style-type: none"> ○ Daily grain shortage: Only one slice of bread (1 oz eq grain) was offered with the chicken and gravy entree. 2 oz eq is required for high school students. This is considered a repeat finding. ○ Weekly grain shortage.: Due to the daily grain shortage, there is also a weekly grain shortage. This is considered a repeat finding. 				4/2/2019 1:53:52 PM
04/02/2019	403	1104	Administrative Review	All School Sites Visited
Comments				
				Created Date
<ul style="list-style-type: none"> • There were no competitive foods or beverages sold at Point of Discovery. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks standards, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. 				4/3/2019 1:25:00 PM

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<ul style="list-style-type: none"> Jefferson and McKinley did hold fundraisers and they met the state defined fundraiser exemption limit of two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. Keep in mind that ongoing unhealthy food and/or beverage fundraisers within schools is discouraged, as it does not align with the intentions of Smart Snacks standards and the Healthy Hunger-Free Kids Act. Constant unhealthy food and/or beverage fundraisers undermine progress made as a school nutrition department, and district, to provide healthy, balanced meals to students. Whenever possible, the district is strongly encouraged to help student organizations find ways to fundraise that promote a healthy lifestyle. More information on healthy fundraisers can be found on our Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks). 				
04/02/2019	402	406	Administrative Review	Point of Discovery School
Comments				
				Created Date
<ul style="list-style-type: none"> There is no overlap in calorie requirements for students in grades 6-8 and those in grades 9-12. This means grades 6-8 cannot follow the same meal pattern as grades 9-12. At Point of Discovery, consider separating the grade groups as grades 6-8 and grades 9-12 to simplify meal service. If grades cannot be separated, consider posting signage instructing students what serving sizes are needed for their grade level, making different size spoodles available when needed, and using different cafeteria lines or colored trays for varying grade groupings. 				4/3/2019 1:07:25 PM
04/02/2019	401	400	Administrative Review	Point of Discovery School
Comments				
				Created Date
<p>Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way to collect meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the Meals on Field Trips overview (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf).</p>				4/3/2019 10:37:34 AM