

# Administrative Review Report

Random Lake School District

## Review Schedule:

| Schedule Type            | Start Date | End Date   |
|--------------------------|------------|------------|
| Off-Site Review          | 11/08/2019 | 02/24/2020 |
| On-Site Review           | 03/09/2020 | 03/10/2020 |
| Site Selection Worksheet | 11/08/2019 | 11/15/2019 |
| Entrance Conference      | 03/09/2020 | 03/09/2020 |
| Exit Conference          | 03/10/2020 | 03/10/2020 |

## Commendations:

Thank you to the staff at Random Lake School District for the courtesies extended during the on-site review. Thank you for being available for 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. Having a significant amount of information and strong communication prior to the on-site visit made the review go smoothly.

The food service director did an excellent job preparing for the review, and was 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 cafeterias were inviting and interactions between staff and students during meal times were positive and customer-service focused. The set-up of the serving line at the high school keeps the students moving quickly and features a wide variety of meal choices. The cafeteria also features creative, bright, wall murals that add visual appeal to the dining space. The food service director is very knowledgeable and works hard to ensure staff members are trained and supported, students are fed nutritious meals, and program regulations are met. Professional standards training hours for all staff members exceeded the requirements and were well-tracked on the DPI tracking tool. Keep up the good work on professional standards!

The determining official does a great job managing meal applications. The official frequently contacts households for clarification when needed and double checks all online applications. There were minimal benefit issuance errors due to the diligence of the determining official. Great job!

The district's Food Service webpage is very well developed and informative. The menus posted on the website are bright and appealing. Great job making resources available online!

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## Findings and Corrective Action:

|                                  |  |
|----------------------------------|--|
| <b>Site Name</b>                 |  |
| <b>Form Name</b>                 | Meal Counting and Claiming (300 - 311)   |
| <b>Question #</b>                | 305  |
| <b>TA Log #</b>                  | TA Log# exists   |
| <b>Due Date</b>                  |  |
| <b>Corrective Action Status</b>  | Flagged  |
| <b>Corrective Action History</b> | <p><b>Finding:</b> The SFA offers field trip meals but the POS system for field trip meals does not meet requirements. Currently, student accounts are charged for meals when the teachers pick up the meals from kitchen for the field trip. The charges are based on which students ordered a meal, and not on which students actually received a reimbursable meal at lunch time. As a reminder, the POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal.</p> <p><b>Corrective Action:</b> Modify the POS system so that students are checked off by an adult when they actually receive their meal. Completed sheets should be returned to food service and used for charging student accounts. Submit a written plan detailing how field trip meals will be counted and claimed going forward, including a copy of the check off sheet that will be used at the POS. The Field Trip meal resources on the <a href="#">Lunch Menu Planning webpage</a> can be of assistance for these items.</p> |
| <b>Site Name</b>                 |  |
| <b>Form Name</b>                 | Civil Rights (800 - 807)   |
| <b>Question #</b>                | 803  |
| <b>TA Log #</b>                  | TA Log# exists   |
| <b>Due Date</b>                  |  |
| <b>Corrective Action Status</b>  | Flagged  |
| <b>Corrective Action History</b> | <p><b>Finding:</b> The SFA does not have procedures for handling discrimination complaints specific to the USDA school meals programs (FNS Instruction 113-1).</p> <p><b>Corrective Action:</b> Provide a timeline for when a specific school meals programs civil rights complaint policy/procedures will be put in place, or added to an existing district policy. Provide the name and title of the SFA representative that will ensure compliance. See corresponding technical assistance for resources to aid in this process, including a template policy.</p>   |
| <b>Site Name</b>                 |  |
| <b>Form Name</b>                 | Certification and Benefit Issuance (124 - 142)   |
| <b>Question #</b>                | 126  |
| <b>TA Log #</b>                  | No TA Log# found   |
| <b>Due Date</b>                  |  |
| <b>Corrective Action Status</b>  | Flagged  |
| <b>Corrective Action History</b> | <p><b>Finding:</b> There were two applications that were approved incorrectly, which affected a total of four students.</p> <p>One application was approved as free based on a case number. However, the assistance program name was not obtained. Since the school year 2018-19, the state of Wisconsin requires that all case numbers applications also list the program name. Because this application was approved without obtaining the program name, it is considered incomplete.</p> <p>The second application omitted one of the reported incomes from the total household income calculation. The application was approved as free but should have been approved as reduced-price eligible. As a reminder, all reported income (including child income) must be included in the total household income calculation.</p> <p>The error percentage is below the threshold that would require an independent</p>  |

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|                                  | <p>review of applications and below the threshold for calculating fiscal action. In this case, fiscal action will not be calculated. However, when fiscal action is calculated, these types of errors could result in a reclaim of funds.</p> <p><b>Corrective Action:</b><br/>For the case number application: Contact the household to obtain the assistance program name for the case number provided. If the program name the household provides is for an eligible assistance program (Food Share/SNAP, Wisconsin W-2 Cash Benefits/TANF, or FDIPR only), the determining official must record the program name on the application records to prove that the meal benefit application is complete and correctly approved. If the program name the household provides is for an ineligible program (such as Medicaid, Badger Care, WIC, etc.), the determining official must send a notice of adverse action to the household. The adverse action letter must advise that the student's status will change to "paid" 10 calendar days after the date the letter is sent. In this case, the household could choose to complete an application to see if they are eligible based on income.</p> <p>For the incorrectly calculation application: The determining official must send the household a notice of adverse action advising them that their child(ren) will change from free to reduced-price eligible 10 calendar days after the date the letter is sent. A template adverse action is available under the Documents tab of SNACS.</p> <p>Additional information about adverse action is available in the <a href="#">Eligibility Manual</a>. To satisfy this corrective action, please submit copies of adverse action letters sent and/or any additional documentation obtained that supports the benefits for the students in question.</p> |
| <b>Site Name</b>                 |  |
| <b>Form Name</b>                 | Certification and Benefit Issuance (124 - 142)   |
| <b>Question #</b>                | 130  |
| <b>TA Log #</b>                  | No TA Log# found   |
| <b>Due Date</b>                  |  |
| <b>Corrective Action Status</b>  | Flagged  |
| <b>Corrective Action History</b> | <p><b>Finding:</b> The SFA provides a fee reduction incentive to all households that complete a free/reduced-price meal application. Under USDA regulations, the meal application may only be used for determining free and reduced-price benefits for children participating in the school nutrition programs. Completing an application for free or reduced-price meals is completely at the discretion of the household and schools may not require or offer financial incentives to complete the application.</p> <p><b>Corrective Action:</b> Please submit a detailed statement indicating the steps the district intends to take to immediately discontinue the practice of providing fee discounts in exchange for completed meal applications.</p>  |
| <b>Site Name</b>                 |  |
| <b>Form Name</b>                 | Certification and Benefit Issuance (124 - 142)   |
| <b>Question #</b>                | 134  |
| <b>TA Log #</b>                  | No TA Log# found   |
| <b>Due Date</b>                  |  |
| <b>Corrective Action Status</b>  | Flagged  |
| <b>Corrective Action History</b> | <p><b>Finding:</b> The SFA did not perform Direct Certification (DC) in the required timeframes (7 CFR 245.6). Full enrollment DC runs must be performed at least three times each school year: at or around the beginning of the school year, 3 months after the initial match and again 6 months after the initial match, plus an additional time close to April 1 (7 CFR 245.6). The SFA frequently runs DC, but typically only does partial enrollment runs and excludes students already directly certified for free meals.</p> <p><b>Corrective Action:</b> Provide a statement of how and when the SFA will perform the full enrollment DC runs in the required time frames during the school year. For additional information, please reference the DC User Guide, DC Webcast, and other resources on the <a href="#">DC webpage</a>.</p>  |
| <b>Site Name</b>                 |  |

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|----------------------------------|---|--|
| <b>Form Name</b>                 | Professional Standards (1210 - 1219)  |  |
| <b>Question #</b>                | 1219  |  |
| <b>TA Log #</b>                  | No TA Log# found  |  |
| <b>Due Date</b>                  |   |  |
| <b>Corrective Action Status</b>  | Flagged   |  |
| <b>Corrective Action History</b> | <p><b>Finding:</b> Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive and track job-specific training in the current school year (7 CFR 210.30). The district's administrative assistant is responsible for submitting claims, managing student meal accounts, and completing necessary food service journal entries. These duties qualify the staff member as "non-school nutrition program staff with job duties pertaining to school nutrition programs" and thus four hours of professional standards training annually are required (including civil rights training).</p> <p><b>Corrective Action:</b> Submit a tracking tool that reflects any school nutrition training completed by the administrative assistant in the current school year thus far. Please also submit a plan for how training requirements for this staff member will be met going forward. Reference the <a href="#">Professional Standards webpage</a> for training ideas, tracking tool templates, and guidance on requirements.</p> |  |
| <b>Site Name</b>                 | Random Lake Hi  |  |
| <b>Form Name</b>                 | Meal Components and Quantities - Review Period (409-412)  |  |
| <b>Question #</b>                | 409   |  |
| <b>TA Log #</b>                  | No TA Log# found  |  |
| <b>Due Date</b>                  |   |  |
| <b>Corrective Action Status</b>  | Flagged   |  |
| <b>Corrective Action History</b> | <p><b>Finding:</b> Standardized recipes are required for all menu items that have more than one ingredient. The recipes currently being used are not properly standardized to the Random Lake School Kitchen. Lunch meal pattern grade groupings listed on recipes is incorrect. Recipes must list the correct lunch meal pattern grade groupings, K-5, 6-8, K-8, or 9-12.</p> <p><b>Corrective Action:</b> Submit standardized recipes for the follow lunch entrees served during the week of review and the day of observation.</p> <ul style="list-style-type: none"> <li>• Chicken Caesar Salad</li> <li>• Southwest Salad</li> <li>• Cranberry Turkey Wrap</li> <li>• Garden Salad - Cottage Cheese</li> <li>• Rice</li> </ul>   |  |

## Technical Assistance Entries:

| TA Date   | TA Log # | Question # | TA Area               | Site | SFA Contact       | Email | Phone                | User Name |
|---|----------|------------|-----------------------|------|-------------------|-------|----------------------|-----------|
| 03/18/2020  | 1981     | 1400       | Administrative Review | ALL  |                   |       |                      |           |
| <b>Comments</b>   |          |            |                       |      |                   |       |                      |           |
| <b>HACCP Process 3</b>  |          |            |                       |      | <b>Created By</b> |       | <b>Created Date</b>  |           |
| The SFA does not prepare any scratch food items that would be classified as complex food preparation HACCP process 3 items. However, any items that are cooked, cooled, reheated, and served are considered HACCP process 3 items. This includes the saving of hot leftovers for future use. For example, if at the end of meal service, unserved chicken patties are cooled, frozen, and then reheated and served at a later date they would be considered HACCP process 3 menu items. It is recommended to update the HACCP process categorization charts in the food safety plans to reflect this. |          |            |                       |      |                   |       | 3/18/2020 9:03:29 AM |           |
| 03/18/2020  | 1980     | 314        | Administrative Review | ALL  |                   |       |                      |           |
| <b>Comments</b>   |          |            |                       |      |                   |       |                      |           |
| <b>School Year Definition</b>   |          |            |                       |      | <b>Created By</b> |       | <b>Created Date</b>  |           |
| As a reminder, the school year is defined as July 1--June 30 for nutrition program purposes. The online contract for the 2019-20 school year is for 7/1/19 to 6/30/20. If an SFA serves reimbursable meals or snacks in the summer, any meals/snacks served in June   |          |            |                       |      |                   |       | 3/18/2020 8:57:12 AM |           |

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| 2019 get claimed through the 2019-20 contract and are recorded as part of the 2019-20 school year. Any meals/snacks served in July or August 2020 get claimed through the 2020-21 contract.  |      |     |                       |            |                      |  |  |  |
|--|------|-----|-----------------------|------------|----------------------|--|--|--|
| 03/18/2020   | 1979 | 306 | Administrative Review | ALL        |                      |  |  |  |
| Comments   |      |     |                       |            |                      |  |  |  |
| Enrollment on Claims   |      |     |                       | Created By | Created Date         |  |  |  |
| The enrollment number reported for each site on the monthly claims should reflect only the number of enrolled students with access to that meal. If everything is coded correctly and the proper parameters are set, the edit check report should yield an accurate enrollment number for each program for each school. If the total enrollment or number of students eligible (free, reduced, paid) on the edit check report do not match other reports in the software system (such as enrollment reports or eligibility reports), the vendor should be contacted to investigate any discrepancies between reports.  |      |     |                       |            | 3/18/2020 8:53:21 AM |  |  |  |
| 03/18/2020   | 1978 | 306 | Administrative Review | ALL        |                      |  |  |  |
| Comments   |      |     |                       |            |                      |  |  |  |
| Edit Check Report  |      |     |                       | Created By | Created Date         |  |  |  |
| It is recommended that the claim preparer(s) further explore the features of the software system's edit check. The edit check report shows a warning on the bottom if there are days when the meal counts by category exceed the attendance adjusted eligible counts per category. If this is indicated on the edit check report, the claim preparer should review the days in question and ensure that the meal counts do not exceed the number eligible in each category. There may be days when the actual meal counts exceed the attendance adjusted eligible number due to a small number of eligible students and high meal participation. However, daily meal counts should never exceed the number of enrolled eligible students in each category on any given day.<br><br>For example, there may be days when 24 reduced-price lunches are served. If there are 25 reduced-price eligible students enrolled and a 92% attendance factor, it would be expected that up to 23 reduced-price meals would be served daily. Because the number of reduced-price meals served (24) exceeds the attendance adjusted eligible number (23), this would cause a flag on the edit check report from the software system. Upon a double check, the claim preparer could confirm that the 24 meals served is acceptable as it does not exceed the 25 enrolled reduced-price eligible students. |      |     |                       |            | 3/18/2020 8:47:43 AM |  |  |  |
| 03/18/2020   | 1977 | 314 | Administrative Review | ALL        |                      |  |  |  |
| Comments   |      |     |                       |            |                      |  |  |  |
| Online Contract  |      |     |                       | Created By | Created Date         |  |  |  |
| The online contract indicates that all three schools are "in program" for the non-area eligible Afterschool Snack Program (ASP). However, discussions during the on-site visit indicated that the ASP primarily serves elementary students that attend the school-run daycare after the school day. The daycare is available for infants and children up to age 14, which would include the middle school students. Occasionally, there are other middle school or high school students that help with the daycare after school and receive a reimbursable snack as part of assisting. Because the ASP operates as non-area eligible, students are charged and counted via their individual meal accounts when they receive snacks. This results in separate edit check reports and lines on the claim for each school. There have not been any high school students claimed in ASP yet this school year, however it is possible. In order to more clearly communicate the ASP set-up and program access, please update Schedule A of the online contract to reflect that the daycare/elementary is an alternate serving location for the middle school and high school ASP.   |      |     |                       |            | 3/18/2020 8:37:16 AM |  |  |  |
| 03/17/2020   | 1976 | 314 | Administrative Review | ALL        |                      |  |  |  |
| Comments   |      |     |                       |            |                      |  |  |  |
| Afterschool Snack Program ADA  |      |     |                       | Created By | Created Date         |  |  |  |
| The average daily attendance (ADA) reported on the Afterschool Snack Program (ASP) claim should reflect the ADA of the afterschool programming. Currently, the SFA uses the ADA for the regular school day instead of ADA specific to the afterschool programming. The SFA should periodically (at least monthly, at minimum) take attendance at the afterschool programming in order to determine an accurate ADA to report on the claim. An accurate ADA is needed so that built-in edit checks in the online claiming system can effectively prevent over-claiming.   |      |     |                       |            | 3/17/2020 3:52:07 PM |  |  |  |
| 03/17/2020   | 1975 | 314 | Administrative Review | ALL        |                      |  |  |  |

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| Comments  |      |      |                       |     | Created By | Created Date          |
|---|------|------|-----------------------|-----|------------|-----------------------|
| <b>Afterschool Snack Program Access</b>   |      |      |                       |     |            |                       |
| <p>The SFA offers the Afterschool Snack Program (ASP) to children in the district that the attend school-run daycare after school. The daycare enrolls infants through 14 year olds. During the ASP meal service, only children old enough to eat the solid food snack items are offered reimbursable snacks and are claimed for reimbursement. ASP access cannot be limited to only certain daycare children. If ASP will continue to be offered to the PM daycare attendees, then all children in attendance must have the opportunity to participate in ASP and receive a snack that meets their age-specific needs--this includes infants that rely on formula and/or breastmilk or are transitioning to solid foods.</p> <p>Please reference the resources and meal pattern charts on the <a href="#">Infants and Preschool in NSLP and SBP webpage</a>--there is information regarding snacks for infants. Please work on providing ASP access to all PM daycare children, and be sure to contact an infant/preschool specialist with questions about program implementation for infants. Additionally, improvements should continue to be made to ASP production records. The production records should include the menu items, food used, serving size (including of packaged grain items), amounts used, number of children served, and number of adults served. Please reference the <a href="#">Afterschool Snack webpage</a> for production record requirements and a template.</p> |      |      |                       |     |            | 3/17/2020 3:46:13 PM  |
| 03/17/2020  | 1973 | 1600 | Administrative Review | ALL |            |                       |
| Comments  |      |      |                       |     | Created By | Created Date          |
| <b>Breakfast Participation</b>  |      |      |                       |     |            |                       |
| <p>Despite the Grab &amp; Go and second chance breakfast models at the high school, breakfast participation is low compared to lunch. The food service director, principal, and district administrator(s) are encouraged to continue to explore ways to increase breakfast participation. The <a href="#">DPI SNT Resources for the School Breakfast Program webpage</a> and the <a href="#">USDA School Breakfast Program Marketing webpage</a> have a variety of resources and ideas to aid in increasing participation.</p>  |      |      |                       |     |            | 3/17/2020 12:52:10 PM |
| 03/17/2020  | 1972 | 305  | Administrative Review | ALL |            |                       |
| Comments  |      |      |                       |     | Created By | Created Date          |
| <b>Second Meals</b>   |      |      |                       |     |            |                       |
| <p>Per the food service director, when students take additional items in addition to their reimbursable meal they are typically charged a la carte prices per item. On the rare occasion a student takes an entire second meal, they are charged an established "second meal" price. Due to Smart Snacks requirements, each individual food item sold to students outside of the reimbursable meal, on the school campus, during the school day must meet the Smart Snacks standards. A bundled second meal charged at a "second meal" price would not meet Smart Snacks standards. Please ensure that staff consistently charge students a la carte prices for each item they select in addition to their reimbursable meal.</p>   |      |      |                       |     |            | 3/17/2020 12:47:28 PM |
| 03/17/2020  | 1971 | 705  | Administrative Review | ALL |            |                       |
| Comments  |      |      |                       |     | Created By | Created Date          |
| <b>Transfers to Fund 50</b>   |      |      |                       |     |            |                       |
| <p>A transfer from non-federal funds was made into Fund 50 in the school year 2018-19 because food service expenses exceeded revenue for the school year. However, because Fund 50 had an account balance at the start of 18-19, there was still a positive balance in Fund 50 at the end of the school year. For this reason, the transfer was not required but it cannot be taken back out of Fund 50 at this point. Fund transfers into Fund 50 are only required if there is a negative balance in the account at the end of the school year. A negative balance would mean that expenses exceeded the sum of the beginning fund balance and revenues for the school year. Please contact a <a href="#">Nutrition Program Consultant</a> for assistance determining if a fund transfer is needed, if clarification is needed.</p>   |      |      |                       |     |            | 3/17/2020 11:59:42 AM |
| 03/17/2020  | 1970 | 705  | Administrative Review | ALL |            |                       |
| Comments  |      |      |                       |     | Created By | Created Date          |
| <b>Free Breakfast</b>   |      |      |                       |     |            |                       |
| <p>The district elected to provide universal free breakfast for elementary students for the 2019-20 school year. The food service account absorbs the cost of providing free breakfast to reduced-price eligible students, and the district pays Fund 50 for the paid elementary breakfasts. This set-up is acceptable. However, please note, that providing universal free breakfast is an allowable cost to Fund 50. If it is sustainable and feasible, Fund 50 could fully cover this expense--the district is not required to cover the cost of the paid elementary breakfasts, though it can continue to do so if desired.</p>   |      |      |                       |     |            | 3/17/2020 11:51:50 AM |
| 03/17/2020  | 1969 | 709  | Administrative Review | ALL |            |                       |

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| Comments  |      |      |                       |     | Created By | Created Date          |
|---|------|------|-----------------------|-----|------------|-----------------------|
| <b>Non-Program Food Revenue Tool</b>  |      |      |                       |     |            |                       |
| The food service director submitted a completed non-program food revenue tool for the district for the current school year. The tool indicated compliance with the corresponding requirements. As a reminder, this tool (either the DPI version or the USDA version) must be completed annually with district-wide data. It can be beneficial to complete the tool near the end of the school year to determine if any prices should be adjusted when the next school year begins.  |      |      |                       |     |            | 3/17/2020 11:44:05 AM |
| 03/17/2020  | 1968 | 1000 | Administrative Review | ALL |            |                       |
| Comments  |      |      |                       |     |            |                       |
| <b>Local Wellness Policy Improvements</b>   |      |      |                       |     |            |                       |
| While the SFA's wellness policy does meet all the minimum content requirements, there are several ways the policy could be improved. The SFA should consider adding more specific language and defined, measurable goals. It is highly recommended to specifically reference the Healthy Hunger-Free Kids Act and Smart Snacks in Schools. The content related to school meals, foods sold, foods provided but not sold, and the triennial assessment are areas that could most be improved upon. Please work towards a wellness policy that is more district-specific and speaks to the local goals for the schools and students.  |      |      |                       |     |            | 3/17/2020 11:40:40 AM |
| 03/17/2020  | 1967 | 1001 | Administrative Review | ALL |            |                       |
| Comments  |      |      |                       |     |            |                       |
| <b>Local Wellness Policy Availability</b>   |      |      |                       |     |            |                       |
| SFAs are required to make their local wellness policies publicly available. This is commonly achieved by posting the full policy on the school website. The SFA has met this requirement, however the wellness policy is hard to find on the district's webpage. The SFA is encouraged to improve the public availability of the wellness policy so that it is easily accessible to students, staff, parents, and community members.  |      |      |                       |     |            | 3/17/2020 11:36:00 AM |
| 03/06/2020  | 1903 | 711  | Administrative Review | ALL |            |                       |
| Comments  |      |      |                       |     |            |                       |
| <b>Local Wellness Policy Resources</b>  |      |      |                       |     |            |                       |
| As the district works on updating and improving the wellness policy, it is recommended to review the resources on the <a href="#">Local Wellness Policy webpage</a> . Of particular interest may be: <ul style="list-style-type: none"> <li>The Local Wellness Policy Builder contains sample language that can be used when updating a policy</li> <li>The Local Wellness Policy Checklist provides a summary of required content areas that must be included in the policy</li> </ul>   |      |      |                       |     |            | 3/6/2020 11:17:07 AM  |
| 03/06/2020  | 1901 | 1000 | Administrative Review | ALL |            |                       |
| Comments  |      |      |                       |     |            |                       |
| <b>Local Wellness Policy Triennial Assessment</b>   |      |      |                       |     |            |                       |
| SFAs must complete an assessment of their local wellness policy (LWP) at least once every three years, with the first triennial assessment completed no later than June 30, 2020. The assessment must measure the SFA's compliance with their LWP, a description of the SFA's progress toward meeting LWP goals, and how the LWP compares to a model policy. A report must be developed and released to the public, but there is no mandatory template for this report.   |      |      |                       |     |            |                       |
| The <a href="#">Wellness School Assessment Tool (WellSAT)</a> allows SFAs to evaluate how their policy compares to a model policy. It includes 67 policy items considered to be best practices for school wellness. SFAs rate the extent to which their policy contains language related to each policy item. Scores are calculated for comprehensiveness (extent to which recommended content areas are covered in the policy) and strength (how strongly the policy items are stated). The Local Wellness Policy Evaluation the district has from The Wisconsin Obesity Prevention Initiative could be a substitute for the WellSAT, as this evaluation compares the district's policy to a model policy. |      |      |                       |     |            |                       |
| The <a href="#">Local Wellness Policy Report Card</a> is a free, online tool SFAs may use to evaluate compliance with their policy and provide a description of progress made toward meeting policy goals. SFAs enter their policy-specific objectives and evaluate the extent to which they were achieved. The tool includes a section for SFAs to input their WellSAT scores.   |      |      |                       |     |            |                       |
| Following completion of the tool, a report is generated. The SFA could choose to skip the WellSAT portion of the report card, and instead include a copy of the Local Wellness Policy Evaluation referenced above with the completed report card to constitute the full triennial assessment report. If fully completed, the report card meets all requirements of the  |      |      |                       |     |            | 3/6/2020 10:07:38 AM  |

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| triennial assessment. Please visit the <a href="#">Local Wellness Policy webpage</a> for more information.   |      |      |                       |            |                      |  |  |  |
|--|------|------|-----------------------|------------|----------------------|--|--|--|
| 03/06/2020   | 1902 | 1003 | Administrative Review | ALL        |                      |  |  |  |
| Comments   |      |      |                       |            |                      |  |  |  |
| Local Wellness Policy Committee  |      |      |                       | Created By | Created Date         |  |  |  |
| The SFA must permit parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. SFA wellness committees should include a diverse team of committed school and community stakeholders. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP (7 CFR 210.31).   |      |      |                       |            | 3/6/2020 10:01:27 AM |  |  |  |
| 03/06/2020   | 1906 | 1006 | Administrative Review | ALL        |                      |  |  |  |
| Comments   |      |      |                       |            |                      |  |  |  |
| Adult Meal Prices  |      |      |                       | Created By | Created Date         |  |  |  |
| The SFA establishes the adult meal prices by charging a specific percentage more than the student prices. This method has consistently resulted in adequate adult meal prices. However, there are also tools available on the <a href="#">Financial Management webpage</a> that can be used to determine the minimum prices that must be charged for adult meals annually: the <a href="#">Adult Meal Pricing Worksheet</a> and the reimbursement rate charts. Using these tools will help the SFA ensure the minimum pricing requirements continue to be met.   |      |      |                       |            | 3/6/2020 9:58:59 AM  |  |  |  |
| 03/06/2020   | 1900 | 803  | Administrative Review | ALL        |                      |  |  |  |
| Comments   |      |      |                       |            |                      |  |  |  |
| Civil Rights Complaint Procedures  |      |      |                       | Created By | Created Date         |  |  |  |
| Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous. All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the <a href="#">Template Civil Rights Complaint Procedures</a> to create written procedures. An SFA may always attempt to resolve a situation that is occurring in real time; however, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.   |      |      |                       |            | 3/6/2020 9:49:12 AM  |  |  |  |
| If a complaint of discrimination is received at your district, the following procedures should be followed: <ol style="list-style-type: none"> <li>1. Document the complaint using the USDA Program Discrimination Complaint Form (Espanol).</li> <li>2. Submit complaints within five days of receiving the complaint to: Wisconsin Department of Public Instruction (DPI) Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 Fax: (608) 267-0363 Email: <a href="mailto:jessica.sharkus@dpi.wi.gov">jessica.sharkus@dpi.wi.gov</a>.</li> <li>3. Maintain a Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members who have a legitimate need to know.</li> </ol> |      |      |                       |            |                      |  |  |  |
| 03/06/2020   | 1899 | 305  | Administrative Review | ALL        |                      |  |  |  |
| Comments   |      |      |                       |            |                      |  |  |  |
| Visiting Students  |      |      |                       | Created By | Created Date         |  |  |  |
| It is allowable to charge visiting students of school age the paid student lunch price and claim them in the paid category. This is not required, but it is an option that may be desirable especially if non-enrolled school aged children frequently visit the district during meal periods.   |      |      |                       |            | 3/6/2020 9:47:32 AM  |  |  |  |
| 03/06/2020   | 1898 | 110  | Administrative Review | ALL        |                      |  |  |  |
| Comments   |      |      |                       |            |                      |  |  |  |
| Direct Certification Letter  |      |      |                       | Created By | Created Date         |  |  |  |
| The direct certification (DC) notification letter should be updated so it more accurately communicates all necessary information. It is recommended to specify the reasons that a child may have matched to DC. The letter currently references an "application for educational benefits," however this should likely say "application for meal benefits." The   |      |      |                       |            | 3/6/2020 9:45:15 AM  |  |  |  |



# Administrative Review Report

Random Lake School District

|  |      |     |                       |                   |  |                     |  |
|--|------|-----|-----------------------|-------------------|--|---------------------|--|
| letter should also clarify that eligibility due to status as a foster child does not extend to other children in the household, unless there is also a household member receiving benefits from an eligible assistance program. Finally, the letter should provide more detailed information about extension of benefits to other children in the household and more specific instructions on how to notify the school district of other children in the household not listed on the letter. It is highly recommended to reference the <a href="#">DPI DC template letter</a> and adopt the language therein.                                  |      |     |                       |                   |  |                     |  |
| 03/06/2020   | 1897 | 110 | Administrative Review | ALL               |  |                     |  |
| <b>Comments</b>  |      |     |                       |                   |  |                     |  |
| <b>Letter Templates</b>  |      |     |                       | <b>Created By</b> |  | <b>Created Date</b> |  |
| Please note that the DPI School Nutrition Team (SNT) does not approve notification letters as part of the online free/reduced-price meal application process. If an SFA uses an online application, the software vendor distributing these applications to households must be DPI-approved. This approval process only involves examination of the application itself. It is up to SFAs to ensure the notification letters (direct certification, application approval, application denial, etc.) meet requirements. It is highly recommended to annually compare the letters in the software system to the most updated DPI template letters. |      |     |                       |                   |  | 3/6/2020 9:37:21 AM |  |
| 03/06/2020   | 1895 | 211 | Administrative Review | ALL               |  |                     |  |
| <b>Comments</b>  |      |     |                       |                   |  |                     |  |
| <b>Verification Results Letter</b>   |      |     |                       | <b>Created By</b> |  | <b>Created Date</b> |  |
| It is recommended to update the "We Have Checked Your Application" verification letter so it more accurately communicates the requirements if the household chooses to reapply for benefits. If a household has their benefits decreased as a result of verification (such as if their documentation did not support their benefit or they did not submit documentation), they must submit documentation with their application if they choose to reapply within the same school year. Please reference page 59 of the <a href="#">Eligibility Manual</a> , 7 CFR 245.6a(f)(7), and the corresponding <a href="#">DPI template letter</a> .    |      |     |                       |                   |  | 3/6/2020 9:29:26 AM |  |
| 03/06/2020   | 1893 | 211 | Administrative Review | ALL               |  |                     |  |
| <b>Comments</b>  |      |     |                       |                   |  |                     |  |
| <b>Verification Notification Letter</b>  |      |     |                       | <b>Created By</b> |  | <b>Created Date</b> |  |
| It is recommended to update the "We Must Check Your Application" letter used for verification so that it more accurately communicates acceptable timeframes for documentation. Selected households can submit documentation of income or receipt of assistance from any point in time between the month prior to the application and the time the household is required to provide the documentation. Please reference page 106 of the <a href="#">Eligibility Manual</a> and the corresponding <a href="#">DPI template letter</a> .  |      |     |                       |                   |  | 3/6/2020 9:22:08 AM |  |
| 03/06/2020   |      |     | Administrative Review | ALL               |  |                     |  |
| <b>Comments</b>  |      |     |                       |                   |  |                     |  |
| <b>School Meal Debt</b>  |      |     |                       | <b>Created By</b> |  | <b>Created Date</b> |  |
| At the end of each school year, the district transfers money into Fund 50 for any negative student account balances. The district then takes on the responsibility for contacting households and recovering the money owed for meals. This practice is acceptable and helps ensure that Fund 50 does not absorb any bad debts and takes the debt collection pressure off of food service.  |      |     |                       |                   |  | 3/6/2020 9:22:08 AM |  |