

Administrative Review Report

Sheboygan Area School District

On-Site Review	01/13/2020	01/17/2020
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Commendations:

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

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

Sheboygan Area School District's food and nutrition services department was well-prepared for the Administrative Review (AR) conducted by the Department of Instruction (DPI) School Nutrition Team (SNT) during January 13-16, 2020. 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.

Thank you to the staff at Sheboygan Area School District (SASD) for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. The contacts at each of the reviewed schools - Cooper Elementary, Horace Mann Middle, Longfellow Elementary and North High Schools - were friendly, helpful and interested in the operation at their sites. All were very receptive to recommendations and guidance.

The DPI review team appreciates the eagerness of the staff at the four SASD sites with onsite reviews (Cooper Elementary, Longfellow Elementary, Horace Mann Middle School and North High School) for their willingness to make changes to meet school nutrition program regulations. The district is concerned for the nutritional well-being of their students as evidenced through food safety, menu options, offering School Breakfast at every site, customer service, local wellness, utilizing the Fresh Fruit and Vegetable Program at some elementary sites and providing the Afterschool Snack Program at four sites in cooperation with other groups and programs. Some sites are also offering a Supper meal at some of the schools. We were impressed during meal service that there are options for meal entrees for all grade levels to increase participation. The staff is well-trained, professional and offers wonderful customer service with positive messages in the cafeteria areas.

The DPI review team is confident that SASD will continue to improve their knowledge and operation of child nutrition programs.

Special note: Five hundred eighty eligibility determinations were reviewed with ZERO errors identified. Great work!

From Public Health Nutritionists:

Thank you to all staff at the Sheboygan Area School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. All reviewed sites had a perfect week of review for breakfast and lunch and all grains served were whole grain-rich! Thank you for serving healthy, nutritious meals to the students of the Sheboygan community!

From Fresh Fruit and Vegetable specialist:

Thank you to Sheboygan Area School District for participating in the Fresh Fruit and Vegetable Program (FFVP)! A special thanks to the FFVP Coordinator for providing documentation for the claim validation. There were no findings at Longfellow Elementary. Excellent work!

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Recommendations:

Sheboygan Area School District staff have participated in training opportunities for many years. The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training).

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

It is necessary to investigate if schools are offering food or beverage sales to students outside of the Child Nutrition Programs, and that they comply with the Smart Snacks in Schools rule. It appears that North High School has a Coffee Shop and a School Store with food items, run by students.

At the Afterschool Snack Program (ASSP), if there are other afterschool activities happening at selected schools, those students may participate in the ASSP for a snack, too, along with the ones in the Boys and Girl's Club.

Refer to the concentration of the Quat (quaternary ammonium chloride compounds) sanitizer parts per million (ppm) as recommended by the local sanitarian.

Refer to the Technical Assistance and Compliance Reminders resource sent in an email and in the SNACS Documents tab.

Note:

Lake Country Academy (LCA) is a public non-instrumental Charter school under contract with Sheboygan Area School District (SASD). Sheboygan Area SD is the School Food Authority (SFA) under which LCA is listed as a site on Schedule A of the school nutrition program contract at SASD. Schedule A lists LCA as participating in both the School Breakfast and National School Lunch programs with a grab and go breakfast meal that culminates with a Point of Service into a computer at the end of the service line.

During the Administrative Review (AR) of SASD, it was determined by the DPI review team, based on review of the onsite monitoring documents, that there were inconsistencies with meal counting and claiming procedures that had not received a follow up visit after the SFA's onsite monitoring (OSM) visit. The original OSM form indicated that meal counts were not available on the day the program was monitored (September 19, 2019) because no students participated in the breakfast program that day. The inconsistencies on the OSM form and the absence of documentation of a follow up visit by the SFA, prompted a review of the LCA breakfast program. The DPI review team followed USDA regulations that an administrative program review must include the entire SFA process, with inconsistencies investigated. This resulted in LCA being added as a review site during the AR review.

A full report on the findings at LCA is uploaded to the Documents tab in the School Nutrition Accountability Software (SNACS).

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Findings and Corrective Action - Due Date March 1, 2020:

Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
Corrective Action	<p>Finding: The SFA's Unpaid Meal Charge Policy is communicated to all households at registration time. The mention that if there is no request for refunds, any funds in student accounts will be kept to assist other families is not allowed. SFAs must attempt to contact the student's household to return any funds remaining in the account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property.</p> <p>Corrective Action: Provide a timeline of when the policy will be updated and upload that statement to SNACS. Approved</p>
Form Name	Civil Rights (800 - 807)
Question #	803
Corrective Action	<p>Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Provide a timeline for when a school meal program complaint policy will be put in place, or included in an existing district procedures. Provide the name and title of the SFA representative that will ensure compliance.</p> <p>Approved</p>
Form Name	Verification (207 - 215)
Question #	207
Corrective Action	<p>Finding: SFA did not select the correct number of applications for verification.</p> <p>Corrective Action: Watch the "Verification Process" Webinar and submit completed quiz. https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html</p> <p>Approved</p>
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action	<p>Finding: The non-discrimination statement (NDS) was not included on all required program materials. The household notification letters must contain the full NDS. The statement must also be in at least the font size of the smallest font on the document.</p>

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	<p>Corrective Action: Add the correct Nondiscrimination statement to required program materials and upload updated materials into SNACS.</p> <p>Approved</p>
Form Name	Local School Wellness (1007)
Question #	1007
Corrective Action	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content, including: a) foods provided but not sold, b) food and beverage marketing, c) nutrition promotion, d) triennial assessment and e) update/inform public about the content and implementation of the policy. (7 CFR 210.31).</p> <p>Corrective Action: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. Approved</p>
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1400
Corrective Action	<p>Finding: Each school site within the SFA has a written food safety plan for compliance with Hazard Analysis Critical Control Points (HACCP), but the plan is missing a Standard Operating Procedure (SOP) for providing Field Trip meals. The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).</p> <p>Corrective Action: Update the food safety plan to include an SOP for Field Trip meals, specific for each participating school in the SFA and upload that new SOP into SNACS.</p>
Form Name	Meal Counting and Claiming - Review Period (322-325)
Question #	322
Corrective Action	<p>Finding: SFA did not have accurate internal controls for the edit check of the highest number of students eligible in each meal status category prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. There were no errors noted, just looking for a correct process.</p> <p>Corrective Action: Submit a statement explaining that the edit check will note the highest number of eligible students in each meal status category for each school prior to submitting the claim and the title of person responsible.</p>
Site Name	Cooper Elementary
Form Name	Meal Components and Quantities - Day of Review (400-408)

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Question #	401
Corrective Action	<p>Finding: Three non-reimbursable meals were observed at Cooper Elementary during lunch meal service. See final report.</p> <p>Corrective Action: Submit a statement indicating understanding that students must select a ½ cup serving of fruit, vegetable, or combination, under Offer versus Serve. Explain how this error will be corrected and avoided in the future. As a suggestion, food service staff could pre-portion fruit and vegetable servings to ensure all children take the required ½ cup minimum.</p>
Site Name	North High
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	401
Corrective Action	<p>Finding: 6 non-reimbursable meals were observed at North High School during lunch service. The meals did not contain the required ½ cup fruit, vegetable, or combination under Offer versus Serve or did not contain three full components.</p> <p>Corrective Action: Submit a statement signed by point of service staff indicating understanding that students must select three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Explain how this error will be corrected and avoided in the future.</p>
Site Name	North High
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	404
Corrective Action	<p>Finding: Signage was not posted at North High School to show students what makes up a reimbursable meal. Signage must be posted, visible to students, that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination.</p> <p>Corrective Action: Submit a picture of completed signage posted near the lunch and breakfast service line.</p>
Site Name	North High
Form Name	Smart Snacks (1104 - 1107)
Question #	1104
Corrective Action	<p>Finding: Non-compliant beverages in the vending machine. One of the vending machines in the cafeteria currently has a coffee beverage that is not allowable, as it contains more</p>

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	<p>than 200 calories. The vending machine has been programmed to be unavailable for purchase until 3:00pm. However, the school day ends at 3:00pm; therefore, the vending machine should be locked until 3:30pm.</p> <p>Corrective Action: Please communicate in writing to your vending machine operator of this error. Upon receiving a response that the programming will be corrected to 30 minutes after the bell rings, please forward to the Public Health Nutritionist.</p>
Site Name	Horace Mann Middle School/reviewed sites
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1407
Corrective Action	<p>Finding 1: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with the what is outlined in the site specific SOP's for (insert which SOP).</p> <p>Corrective Action: Modify the SOP so that it aligns with actual practices, or adjust practices to align with the SOP as written. Submit a copy of the updated SOP or a statement describing how practices will be adjusted to be compliant with the established SOP.</p> <p>Finding 2: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with the SOP for sharing or "no thank you" tables.</p> <p>Corrective Action: Submit a statement describing how practices will be adjusted to be compliant with the established SOP. (Include non-compliant areas: not approved by sanitarian, TCS foods are re-serviced, not under adult supervision, not located within a distance able to monitor, unallowable foods on sharing table)</p>
Site Name	Lake Country Academy
Form Name	Civil Rights (811-812)
Question #	811
Corrective Action	<p>Finding: LCA does not mention the availability of breakfast in its handbook or anywhere in the school facility. By regulation, schools are required to provide outreach to students notifying them of the availability of the school breakfast program and how to access the program. By federal regulation under 7 CFR part 220, schools must notify families of the availability of the school breakfast program (SBP) throughout the school year. Note: Schools participating in the SBP must notify families of the availability of school breakfasts at the beginning of the school year, when free and reduced price meal applications are sent to households. In</p>

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	<p>addition, schools should send reminders regarding the availability of the SBP multiple times throughout the school year (e.g. at the beginning of each semester or quarter). Corrective Action: Submit a statement of the procedure and title of person to assure accountability in this correction.</p>
Site Name	Lake Country Academy
Form Name	Civil Rights (811-812)
Question #	812
Corrective Action	<p>Finding: LCA is inhibiting program participation by not allowing free access to all students attending the school. The site is on the contract as a participating site in the school breakfast program. Students should not have to come into the office to obtain a breakfast, parents should not have to call the SFA or the site to request their students receive a breakfast and students should not be stigmatized or overtly identified for wanting to participate in the school breakfast program. Staff needs to provide a breakfast program that provides open access to all students without the stigma of having to go to the office to receive their meal. The SFA indicated that they understand the staff shortages at LCA and are very willing to provide a kiosk/cart and a school nutrition staff member to provide breakfast in the cafeteria, school hallway, Founder's Hall or other mutually agreeable location in the school so all children have access to the breakfast program. Singling out students with special needs or students with free or reduced price meal eligibility, whose parents have specifically requested breakfast, is overt identification and a violation of civil rights. (FNS 113-1) Corrective Action: Submit a statement of the implemented process to correct the procedure to offer the breakfast meal to all students and indicate the title of the person to oversee the new procedure.</p>
Site Name	Lake Country Academy
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	400
Corrective Action	<p>Finding: Milk is a required component of the school breakfast program. Because milk was not offered or available to students, by admission of site staff, as part of the school breakfast program, all breakfasts served at LCA from the beginning of the 2019-20 School Year until corrected, will be disallowed and fiscal action will be taken. Corrective Action: Submit a statement of the knowledge and process to provide all required components available for each meal to be selected by the student. Submit a statement of the title of person to be responsible for assuring the meal pattern</p>

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is met and who will oversee the child nutrition program operation at LCA.

Technical Assistance Entries:

TA Date	Question #	Site	SFA Contact
01/15/2020	1400	ALL	FSD

The DPI SNT website offers a Field Trip resource, which includes an SOP for Field Trip meals. It is found under Menu Planning, then Field Trip.

01/14/2020	404	Horace Mann Middle School	FSD
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At Horace Mann Middle School, there is one sign on the salad bar stating "1 scoop= 1/2 cup." However, tongs are placed in some vegetables (i.e. romaine and celery). There is no signage stating how much to take when using tongs to serve. Revise current signage to include either pictures of a 1/2 cup portion size or the number of pieces of each item to take for a 1/2 cup serving.

01/14/2020	404	Horace Mann Middle School	FSD
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During meal observation at Horace Mann Middle School, the TV screen was utilized to display the menu; however, best practice would be to educate students on the number of components required to make up a reimbursable meal also using the TV screen.

01/13/2020	901	Cooper Elementary	FSD
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Check for the most recent version of the Onsite Monitoring checklist forms for NSLP and SBP meals.

12/03/2019	207	ALL	verifying official
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Alternate Two sampling Method was used. 1% of the 294 applications on file as of October 1 equaled 3 applications. For the second part, it should have been .5% of the number of case number or foster applications on file. According to the Mosaic software report, there were 9 case number applications. This would have been 1 more application for a total of 4 applications to verify. They verified 5 applications.

12/03/2019	305	ALL	SFA
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Visiting students (from another school which participates in NSLP) may be charged the student price and you can claim them in Paid category (unless you want to get source documentation to claim in eligible status category).

12/02/2019	800	ALL	FSD
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The nondiscrimination statement (NDS) must be included on letters, menus, website, and other documents to convey program information to the public. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc>). When space is very limited, (printed menus or low balance notices,)

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the abbreviated statement may be used, "This institution is an equal opportunity provider." Either of these statements must be in the same size font as the other text in the document.