

Administrative Review Report

661687 Erin School District
Review Site: (20) Erin Elementary

Review Schedule:	Start Date	End Date
Off-Site Review	01/24/2019	02/11/2019
On-Site Review	03/06/2019	03/07/2019
Site Selection Worksheet	01/24/2019	01/24/2019
Entrance Conference	03/06/2019	03/06/2019
Exit Conference	03/07/2019	03/07/2019
Corrective Action Deadline	4/9/2019	

Commendations:

- Thank you to the staff at Erin Elementary for your warm welcome and willingness to answer questions during the onsite review. Additionally, we appreciate your flexibility in using the new SNACS software for the audit process.
- Thank you for sending the Public Release to multiple media and grassroots organizations. This lets households in your community know that Erin SD participates in and offers school meal benefits under the USDA NSLP.
- The SFA has high food safety standards. Staff maintain a very pleasant meal preparation and service environment. Production and service spaces are clean and tidy. Keep up the good work!
- Administrative and food service staff work as a team. They are supportive and recognize each individual's contribution to maintaining a high quality lunch program.
- Students have a variety of fruits and vegetables to choose from daily, including at hot vegetable on the serving line and many colorful options on the garden bar.
- Students have a good understanding of what they may select for a reimbursable meal, showing the work staff has done to educate them throughout the school year.
- All staff and students had pleasant and engaging interactions with others in the cafeteria during lunch service.

Comments:

- The SFA utilized the 18-19 SY Paid Lunch Equity (PLE) Flexibility.

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Findings and Corrective Action:

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
Corrective Action	<p>Finding: On the Annual Financial Report, not all of the revenues and expenses are broken out by program and expense category (7 CFR 210.19).</p> <p>CA: Update the 2017-18 Annual Financial Report by pulling out the adult meal and extra milk revenues and expenses from the NSLP. Upload the corrected report into SNACS. Once approved, the consultant will submit the updates to the DPI accountant to enter online.</p>
Form Name	Civil Rights (800 - 807)
Question #	806
Corrective Action	<p>Finding: USDA School Meal Program Civil Rights training has not been completed by administrative staff who have responsibilities related to the programs. (FNS Instruction 113).</p> <p>CA: Have the Authorized Representative, Direct Certification Official, and Bookkeeper review the Civil Rights PowerPoint (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx). The presentation is on the School Nutrition Civil Rights website (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights). Upload a staff roster with the names and date training is completed.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1000
Corrective Action	<p>Finding: Current LWP does not include all of the required content. Missing language includes: Policy Leadership, Public Involvement, Food and Beverage Marketing, Nutrition Promotion, Triennial Assessment, and Updating/Informing the Public.</p> <p>CA: 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.</p>
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Question #	1601
Corrective Action	<p>Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).</p> <p>CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	126
CA Deadline	Complete. No further action required.

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Corrective Action	<p>Finding: The SFA did not process direct certification Medicaid Z code matches correctly. Households received free meal benefits, when they should be reduced. See the SFA-1 uploaded to the documents tab.</p> <p>CA: Notify each household of the correct meal benefit (F→ R) per program requirements. Provide a letter of adverse action allowing 10 <i>calendar</i> days for the household to appeal prior to changing the status to reduced in your point of sale software. Upload a copy of the letter to the household and documentation that the benefit issuance list has been updated into SNACS.</p> <ul style="list-style-type: none"> • Fiscal action will be calculated on these errors. • The error rate is 12.73%, which means the agency will need to conduct independent review of applications in the 19-20 SY.
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action	<p>Finding: The non-discrimination statement on the calendar menu is incorrect.</p> <p>CA: Update the calendar menu with the correct shortened statement, which is "This institution is an equal opportunity provider." Submit the update to the consultant via the SNACS corrective action tab.</p>
Form Name	Meal Counting and Claiming - Review Period (322-325)
Question #	325
Corrective Action	<p>Finding: SFAs software edit check is not correctly categorizing reimbursable paid student meals. The claim preparer is reconciling detailed daily participation reports for all categories to ensure meals are not claimed over those eligible or in attendance. SFA was able to explain claim consolidation process with supporting records. Meal counts by eligibility category are correctly reported on the monthly claim.</p> <p>CA: Contact your software provider and work with them to correct the coding error on the edit check (accuclaim) report. Submit a statement to the consultant through the CA tab in SNACS summarizing the outcome. If the report cannot be corrected, the SFA must continue to check detailed participation reports prior to submitting the monthly claim to the State agency.</p>

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Technical Assistance:		
TA Date	Question #	TA Area
03/08/2019		Nonprofit School Food Service Account & Nonprogram Foods
<p>When updating the 17-18 SY Annual Financial Report (AFR), the Nonprogram Food Revenue Tool Exceptions methodology (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) can be used to separate out the revenue and cost of your Nonprogram foods (adult meals and extra milk) from your program (NSLP) expenses and revenues.</p>		
03/07/2019	182	Refunds
<p>When any student leaves the district or graduates, SFAs must attempt to contact the student's household to return any funds remaining in the account. Currently, there is no approved flexibility to simply set a dollar threshold (e.g., \$10.00). For more information see: SP 46-2016, SP 47-2016, SP 23-2017 and the WI DPI Financial Q& A. https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf</p>		
03/07/2019	181	Unpaid Meal Charges- Bad Debt
<p>Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. SP23-2017 Unpaid Meal Charges guidance Q & A may be found our Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).</p>		
03/07/2019	180	Food Safety
<p>During lunch service, it was observed that some students returned to the garden/salad bar for additional servings of fruits and vegetables (which is allowable). However, students going up for seconds served their portions onto their soiled trays. Clean trays or disposable single-use containers (i.e. portion boats) should be used for second servings at the garden bar. Consider how students and staff could be educated on safe procedures for getting seconds from the garden bar.</p>		
03/07/2019	179	Civil Rights- Complaint Procedures
<p>All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. Include this in the district procedures to ensure compliance.</p>		
03/07/2019	126	Certification and Benefit Issuance
<p>The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.</p>		
03/07/2019	133	Certification and Benefit Issuance- DC Codes
<p>M code in Direct Certification (DC) is Medicaid Free. However, Z code in DC is Medicaid Reduced. Typically DC overrides an application. However, in the case of a Z code (reduced) match, if an application is approved free, then provide the greatest benefit to the student.</p>		
03/07/2019	202	Verification- Confirmation Review
<p>The confirmation review must be done by an individual other than the individual who made the initial eligibility determination [7 CFR 245.6a(e)(1)].</p>		
03/01/2019		Nonprofit School Food Service Account- Annual Financial Report (AFR)

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<p>Q 703 Equipment Purchases and the Annual Financial Report all nonexpendable equipment rental and purchase costs on the AFR under Equipment. An individual item is considered nonexpendable if it costs over \$5,000 per unit (or less if it is the agency policy), and is expected to last over one year. Expendable equipment costs (e.g., pans, serving utensils, trays) should be reported as Other Expenditures).</p>		
03/01/2019		Professional Standards Training
<p>Clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A tracking tool is posted to our SNT webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).</p>		
03/01/2019	1601	Summer Food Service Program (SFSP) Outreach
<p>USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods: •Promotion of the summer meals locator on the DPI Summer Meals webpage •Promotion of calling 211 to locate meals in the area •Promotion of the ability to text 'food' to 877-877 to locate meals in the area •Promotion of the USDA Summer Food website (http://www.fns.usda.gov/summerfoodrocks)</p>		
03/01/2019	1000	Local Wellness Policy
<p>These resources may be helpful in updating your LWP language to include all required content. - Local Wellness Policy Checklist: (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) - Google Form Policy Language Builder: (https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1)</p>		
<p>The first triennial assessment should be completed no later than June 30, 2020. SFAs are required to retain a copy of the assessment and documentation regarding the public notification (7 CFR 210.31). The assessment must assess how you are meeting your goals and objectives and how your policy compares to a model policy. The report card and WellSAT tool can be used to complete these tasks and are available on the SNT website under LWP (https://dpi.wi.gov/school-nutrition/wellness-policy).</p>		
03/01/2019	202	Confirming Official
<p>The principal is listed in the 1819 SY online contract as the confirming official (CO), not the software. It is unallowable to have the software conduct this review. WI SNT does not approve software to function as the CO. The confirmation review was completed by the determining official It was discussed onsite, that the DC runner or Bookkeeper would assume the CO role.</p>		
03/01/2019	111	Certification and Benefit Issuance
<p>DC Medicaid Free (M code) and DC Medicaid Reduced (Z code) can also extend benefits to other students in the household.</p>		

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TA Date	TA Area	Site
03/06/2019	Signage	
<ul style="list-style-type: none"> • Signage must indicate that students must select at least ½ cup fruit and/or vegetable, or a combination with a reimbursable meal. The “Take ½ cup to fill you up” signage is a great way to communicate this to your students. • Please ensure the ½ cup signage remains posted or print and post new signage. Signage examples can be found on our Signage webpage. • Portion sizes of at least 1/8 cup each should be communicated to students with signage on the Garden Bar. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Additional signage on a salad or garden bar can assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a Salad Bar Signage Template with pictures that can be posted on a salad or garden bar. 		
03/06/2019	Pre-K Meal Pattern	
<ul style="list-style-type: none"> • Students not yet in 5K kindergarten may be offered meals using the K-8 meal pattern when they eat at the same time and in the same place as older students or when it would be challenging for food service staff to offer two meal patterns. This may be done under the co-mingling flexibility offered by USDA as part of the updated Child and Adult Care Food Program (CACFP) meal pattern. • As discussed onsite, this flexibility is being used appropriately, as the 4K students move through the serving line and are immediately followed by the kindergarten students. 		
03/06/2019	Social Media	
<ul style="list-style-type: none"> • You are encouraged to share photos of your great program and wellness events with the DPI School Nutrition Team for posting on our social media accounts. Visit the School Nutrition Programs webpage and look for the “share” button on the right side of the page. 		
03/06/2019	Smart Snacks	
<ul style="list-style-type: none"> • Any food or beverage sales outside of reimbursable meals must either be in compliance with the Smart Snacks general and nutritional guidelines, 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. You can find fundraiser tracking tools on our Smart Snacks webpage. • The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. 		