

# Administrative Review Report

Holy Hill Area School District

## Commendations:

**From the Nutrition Program Consultant:** Thank you to the staff at Holy Hill School District for the courtesies extended to everyone during the on-site review and for being available to answer questions and provide additional information. 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. All were very receptive to recommendations and guidance. The food service director and food service team do a nice job of offering nutritional meals to students. It was a pleasure to visit the school!

**From the Public Health Nutritionist:** Thank you to the school nutrition professionals for their time, before, during and after the onsite portion of the Administrative Review. We realize gathering documents and discussing content requires a lot. We would also like to recognize the attentiveness of all school staff, especially those working in the Child Nutrition Program. All were focused on feeding students and interacted with them with interest.

## Recommendations:

The week of January 20-24, 2025, join the SNT in celebrating diversity through globally inspired foods and flavors. Be a part of the goal of having 80 SFAs participating in Around the World in 80 Trays. Take the pledge to participate in any capacity, from adding a new dip or seasoning to showcasing new dishes. Visit the Around the World in 80 Trays webpage to take the pledge, find recipes, and more. After your event, send pictures, videos, sound clips, etc. to [DPIFNS@dpi.wi.gov](mailto:DPIFNS@dpi.wi.gov) so we can share your success!

It is encouraged that staff attend DPI SNT summer trainings. These classes are offered every summer and count towards Professional Standards Training requirements.

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## Findings and Corrective Action:

<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: On the Annual Financial Report, revenue and expenses were not broken out for non-program foods. (Adult meals, extra milk and A la Carte items.) In addition, the expenses and revenues did not match with the PI1505.</p> <p>Corrective Action: Use the AFR template that will be provided to make the required updates. Please upload this document into SNACS. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.</p>
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: 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. The SFA sells some fruit cups which requires the tool to be completed each year. There was discussion on whether the fruit cups will be sold moving forward. Technical assistance was provided on how to run the tool.</p> <p>Corrective Action: Determine if fruit cups will continue to be sold. If so, complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5-day reference period from the current school year. If it is determined that the SFA will not sell fruit cups than the tool is not required to be completed so a statement is required indicating that only adult meals and extra milk will be sold.</p>
<b>Form Name</b>	Indirect Costs (712)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: Indirect costs are being charged to the nonprofit school food service account for custodial services and business manage. A percentage was charged for custodial services. It was noted that 10 percent of custodial wages was charged to the food service fund for services. The business manager charges were determined by the number of hours worked which is allowable and is supported by documentation.</p> <p>Corrective Action: All costs charged to the nonprofit school food service account must be made into direct costs. Identify if indirect charges can be made into direct costs using time studies, meters, etc. Determine what the direct cost would</p>

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		<p>be. If the indirect amount charged is greater than the direct cost calculated, the difference will need to be refunded to the nonprofit school food service account for SY 2023-24 through the Administrative Review. Any indirect costs that cannot be made into direct costs are unallowable and also need to be refunded. A time study was submitted to reviewer prior to being onsite for custodial services. It was found that the actual percentage of custodial time is higher than the 10 percent that is currently being charged. per the time study. Provide a statement of understanding that a time study will be conducted each year and kept on file for custodial staff if any wages are deducted from the food service fund based off a percentage.</p>
<b>Form Name</b>	Civil Rights (800 - 806)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Utilizing the DPI template policy (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx</a>), develop procedures for the SFA and upload into SNACS.</p>
<b>Form Name</b>	Civil Rights (800 - 806)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: One area of the Dietary Modifications Policy needs to be changed. SFA should not ask for a student's medical condition, but only how the condition or symptom affects the student's diet. Language under certification to identify part A needs to be changed.</p> <p>Corrective Action: Change the language regarding the certification must identify: A. an explanation of how the child's physical or mental impairment restricts the child's diet.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (Non-discrimination statement is missing.) (7 CFR 210.31).</p> <p>Corrective Action: Submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)	

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<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) is reviewed and updated by a committee.</p> <p>Corrective Action: Provide a statement on how LWP meetings will be documented to support that the meetings occurred.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p>Corrective Action: Complete the assessment of the Local Wellness Policy. Upload a copy of the Report Card that includes WellSAT scores.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: The SFA did not share the results of the Local Wellness Policy (LWP) assessment with the public per 7 CFR 210.31.</p> <p>Corrective Action: Notify the public of the results of the LWP assessment and upload a copy of the documentation to support this or the appropriate Web site URL linking to the assessment.</p>
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<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>Corrective Action: 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>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: Overt identification of students' eligibility for meal benefits was noted regarding a local fee waiver. The local fee waiver is student fees. When a student qualifies for a free or reduced meal the student automatically receives a fee waiver for student fees. For local fee waivers parental consent is needed. Options were provided to the determining official on</p>

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		<p>how to adjust this practice so there is parental consent. The options included the use of a Sharing of Information Letter or households can self-disclose by providing the notification letter for meal benefits.</p> <p>Corrective Action: Provide a statement on how this practice will be corrected. If the district will move forward with the option to use a consent form, please provide the template that will be used for fee waivers.</p>
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: The non-discrimination statement was not included on all required program materials. The breakfast menu and the food service webpage did not have the non-discrimination statement listed.</p> <p>Corrective Action: Add the Nondiscrimination statement to the menu and upload a copy of the breakfast into SNACS. For the Breakfast menu the shorten version is allowable. Update the Food Service webpage to include the current full version of the non-discrimination statement. Provide a link to the updated Food Service webpage.</p>
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: The new Food Service Director did not meet the food safety training requirements of 8 hours of food safety training within 5 years prior to starting date or within 30 days of hire (7 CFR 210.30(b)(v)).</p> <p>Corrective Action: Complete 8 hours of food safety training and provide documentation of completion.</p>
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: Documentation of school food service staff training is not tracked in a mechanism that has all the required elements to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p>Corrective Action: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job</p>

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		<p>specific training in the current school year (7 CFR 210.30).</p> <p>Corrective Action: Provide a statement on a training plan for the current school year and moving forward for all non-school nutrition staff, with school nutrition program responsibilities. This plan must include a minimum of civil rights training and training related to job duties.</p>
<b>Form Name</b>	Meal Counting and Claiming - Day of Review (317-321)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: The SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. Prices for student meals are visible on the computer screen at the point of service that can be seen by students, which constitutes overt identification.</p> <p>Corrective Action: Work with your software provider to ensure overt identification is not occurring or install screen protectors on monitors. Submit a statement documenting how this was corrected.</p>
<b>Form Name</b>	Meal Counting and Claiming - Review Period (322-325)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: The SFA did not use the correct report from the software when submitting the monthly claims for reimbursement. The SFA uses Skyward software and the report that is to be used is the Accuclaim and not the monthly summary report.</p> <p>Corrective Action: Upload monthly edit checks for breakfast and lunch for August thru November into SNACS. Fiscal action may apply. <b>Edit checks were provided onsite so no further action is needed.</b></p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Per 7 CFR210.10(a)(3) , production records must document how the meals offered contribute to the required meal components and food quantities for each age/grade group, ensuring that food meeting the meal pattern was served in the appropriate portion sizes. Accurate and complete production records are one key piece of supporting documentation that show that meals planned and served are and were reimbursable.</p> <p>Production record templates for breakfast are available on our Production Records webpage (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records</a> ). While these templates are provided to assist schools in meeting documentation requirements, it is not mandatory to use the DPI template.</p>

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	<p>SFAs may create their own production records or use another template, as long as it includes all required information, which can be found on our Production Record Requirements list (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf</a>)</p> <p>Finding: Incomplete breakfast production records during the week of review. Per 7 CFR 210.10(a)(3) , records must show how the meals offered contribute to the required meal components and food quantities for each age/grade group every day. The following were not consistently filled in daily on production records:</p> <p>Menu item with recipe name/reference number or product name/description: Be more specific with brand name, accurate product number, form (canned, fresh, frozen/steamed, etc.). Planned serving size for each grade group and adults: Serving size should be either a weight or volume. If helpful you can include the portion utensil along with the planned serving size or add a separate column for portion utensil.</p> <p>Planned/actual quantity prepared in bulk units (example: # of cans, bags, boxes, pounds).</p> <p>Corrective Action: Upload one full week of completed breakfast production records, including all requirements recorded daily into SNACS. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date. Review the Production Record Requirements (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf</a>).</p>
<b>Form Name</b>	SFA On-Site Monitoring (901 - 904)
<b>Due Date</b>	February 3, 2025
<b>Corrective Action</b>	<p>Finding: The SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p>Corrective Action 1: Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA.</p> <p>Corrective Action 2: Submit a plan on how onsite monitoring will be completed for each school and program moving forward and the position responsible for completing this.</p>
<b>Form Name</b>	

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<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: It was noted that food items that are cooked and kept in a warming unit at the end of the line were not as warm as compared to the same food items served at the beginning of the line. Reviewer recommended several options to improve the process in which to keep foods warm throughout the serving period.</p> <p>Corrective Action: Please review the Standard Operating Procedure for holding foods in regard to time and temperature control during meal service. Provide a plan on how the process will be adjusted so that warm food items throughout the meal service will be kept at the proper temperature.</p>
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. <b>Corrected onsite, no further action required.</b></p>
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Due Date</b>	February 3, 2025	
<b>Corrective Action</b>		<p>Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site-specific SOPs for Glove Usage.</p> <p>Corrective Action: Provide a training on glove usage with staff. It is recommended to review the SOP for glove usage in the food safety plan. Upload into SNACS a roster signed by food service staff to show that this training occurred.</p>

## Technical Assistance Entries:

During the onsite observation, it was noted that some food service staff did not have clear understanding of the Offer versus Serve (OVS) requirements for breakfast. While all students observed selected reimbursable meals, it is important for staff to fully understand OVS requirements and how to effectively implement OVS during meal service. Visit our Online Learning Library for opportunities (<https://dpi.wi.gov/school-nutrition/training/online-learning>)

During the onsite observation, it was observed that the students at Freiss Lake Elementary preferred the romaine lettuce over the sweet potato bake. The planned serving of the romaine lettuce was a 1/2 cup, which credits as a 1/4 cup dark green vegetable. If the students only select the romaine lettuce, they would need to return to the line to select either the fruit option or the sweet potato bake to meet the 1/2 cup fruit and/or vegetable requirement under offer versus serve (OVS). Consider increasing the portion of romaine lettuce to 1 cup, to credit as a 1/2 cup vegetable to accommodate student preferences as well as decrease food waste.



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#435 Standardized Recipes: Standardized recipes are in place for recipes with more than two ingredients. However, the recipes provided for lunch during the week of review and for the day of onsite were missing total yield in weight or volume. Please visit our Standardized Recipes webpage for additional tools, resources, and a checklist of the information needed to standardize a recipe (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/standardized-recipes>). Additional standardized recipes training can be found on our Online Learning Library under the heading "Production Records and Standardized Recipes" (<https://dpi.wi.gov/school-nutrition/training/online-learning>; <https://dpi.wi.gov/school-nutrition/training/online-learning#production-records-standardized-recipes~:text=Production%20Records%20and%20Standardized%20Recipes>).

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. Please review the SNT DPI Webpage for further guidance.

The Professional Standards regulations in 7 CFR 210.30 establish annual training requirements for all school nutrition program directors, managers and staff. This required annual continuing education will vary based on each employee's role in the school nutrition program(s). The Training Requirements Nutshell provides guidance on the required training hours. (<https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards>)

On-site monitoring is required for all School Food Authorities (SFAs) with more than one school site operating the National School Lunch Program (NSLP), and the School Breakfast Program (SBP). The Breakfast Onsite Monitoring form must be completed annually for 50% of sites operating SBP. Each school operating the SBP must be reviewed once every two years. The Onsite monitoring form must be completed annually for all sites operating NSLP. (<https://dpi.wi.gov/school-nutrition/program-requirements/on-site-monitoring>)

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 304-304 to locate meals in the area
- Promotion of the USDA Summer Food website (<http://www.fns.usda.gov/summerfoodrocks>)

At least once every three years, SFAs must assess compliance with the local school wellness policy and make the assessment available to the public. The assessment measures the implementation of the local school wellness policy and includes: The extent to which schools in the SFA are in compliance with the local school wellness policy, the extent to which the local wellness policy compares to model local wellness policies and a description of the progress made in attaining the goals of the local school wellness policy.

In Wisconsin, this assessment is completed by using the Local Wellness Policy Triennial Assessment Report Card, which is a two-step process. Step 1: Complete the Local Wellness Policy Triennial Assessment Report Card. Step 2: Complete the Wellness School Assessment Tool. The completed assessment must be maintained on file per record retention requirements but does not need to be submitted to the DPI School Nutrition Team. (<https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy>)

Starting School Year 24-25, school nutrition program directors, management, and staff who work on NSLP procurement activities are required to complete procurement training annually as a part of Professional Standards. USDA and DPI SNT do not require a specific amount of procurement training hours. SFAs identify which staff work on NSLP purchasing activities and how many hours of training they require. For example, staff with minimal involvement only need a brief

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refresher course whereas staff who have more complex purchasing responsibilities, a few hours may be appropriate. A variety of training formats are acceptable including seminars, webcasts, self guided trainings like reviewing this nutshell, and in person trainings, etc.

Review the DPI SNT Procurement webpage for trainings and resources for your food service operation. Reviewing this Nutshell counts for 15 minutes of professional standards training. Record training hours on your Professional Standards Tracking Tool. (<https://dpi.wi.gov/school-nutrition/program-requirements/procurement>)