

Administrative Review Report

Hamilton School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/07/2019	01/23/2020
On-Site Review	02/04/2020	02/06/2020
Site Selection Worksheet	11/07/2019	11/15/2019
Entrance Conference	02/04/2020	02/06/2020
Exit Conference	02/06/2020	02/06/2020

Commendations:

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

The assistant superintendent of business services does a great job managing the finances for the school nutrition programs. Food service expenses were explained and documented in detail.

The school sites that were reviewed both serve as production kitchens for the other district schools and the two vended private schools. The staff members at these sites do an excellent job keeping up with the busy demands of making a high volume of meals daily. Further, it is great that the district is able to provide meals to two local private schools and help feed more children through those contracts. Keep up the awesome work!

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Findings and Corrective Action:

Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 02/10/2020 02:41 PM</p>	<p>Finding: The SFA offers field trip meals at several schools in the district, including the review site, Silver Spring Intermediate (SSI). 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. Additionally, the SSI food safety plan does not contain a standard operating procedure (SOP) for field trip meals.</p> <p>Corrective Action: Modify the POS system so that students are checked off by an adult as they take their meal at lunchtime on the trip. 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.</p> <p>Additionally, please develop a field trip meal SOP and incorporate it into the food safety plan at SSI. Upload the final SOP into SNACS. The Field Trip meal resources on the Lunch Menu Planning webpage can be of assistance for these items (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).</p>
Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	306	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/11/2020 10:39 AM</p>	<p>Finding: The SFA's unpaid meal charge policy does not meet the USDA requirements that pertain to alternative meals sold to students with negative account balances. When an SFA offers an alternative meals to students with negative or \$0.00 account balances, the meal must:</p> <ul style="list-style-type: none"> • be claimed for reimbursement, meet meal pattern, and be charged to the student/household at the price for which they are approved (\$0.00, \$0.40, or the paid student price); or • not be claimed for reimbursement, have each item priced individually at a price high enough to cover costs, and each item must comply with Smart Snacks; or • not be claimed for reimbursement, be provided free of charge, be paid for with non-federal funds, and the items do not need to meet Smart Snacks <p>The SFA's unpaid meal charge policy states that students in 6th grade and younger will be allowed to borrow from the emergency fund to pay for a maximum of two meals once their balance reaches \$0.00. For unpaid meal charge policy purposes, these meals are considered "alternate meals" because they are being offered under special conditions to students without adequate account balances. Per the SFA policy, these meals are not claimed for reimbursement and are charged to the emergency fund at the adult lunch price. However, the policy does not notify households that these meals are charged at a higher rate than the normal student lunch price. After borrowing for these two meals, the students are given an alternate meal (cheese sandwich, milk, fruit) which is charged at the a la carte prices to the emergency fund. This cheese sandwich meal would also be considered an "alternative meal." The policy specifies that households are expected to repay the emergency fund for the full amount borrowed.</p> <p>Because the first two lunches charged to the emergency fund are not claimed for reimbursement, they are considered non-program foods. These lunches are being sold to the students (since the households are expected to repay the emergency fund for the meals), which means that the food items must meet Smart Snacks</p>

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		<p>requirements. A bundled lunch sold as a non-program food cannot meet the Smart Snacks requirements.</p> <p>Corrective Action: Submit a plan for how the unpaid meal charge procedures will be modified to comply with USDA requirements. Please reference the "Unpaid Meal Charges In a Nutshell" and the USDA "Unpaid Meal Charges: Guidance and Q&A," (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/unpaid-meal-charges-nutshell.pdf; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf). The SFA could:</p> <ul style="list-style-type: none"> • charge the students their regular lunch price for the alternate meals and claim them for reimbursement, if the meals meet meal pattern; or • charge each item in the alternate meal at a la carte prices, ensure each item meets Smart Snacks, and not claim the meal for reimbursement; or • offer the alternate meals free of charge (without the expectation of repayment by the household), not claim the meals, and cover the costs with non-federal funds.
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged</p> <p>02/10/2020 02:52 PM</p>	<p>Finding: The food service director completed the DPI non-program food revenue tool and does so annually, as is required. However, there are a few corrections that must be made to the tool to ensure it is adequately assessing compliance with the non-program food revenue requirements. The meals sold to Pilgrim and Zion during the five day reference period must be added to the non-program food section since these sales occur on a weekly basis. In the program food section of the tool, the paid lunch prices should reflect a weighted average--not a simple average or the highest price only. This can be achieved by calculating the weighted average and entering in the total number of paid lunches, or listing each paid lunch price (\$2.60 and \$2.95) separately.</p> <p>Corrective Action: Please update the completed tool from the current school year so it includes the above information. Upload the modified tool into SNACS.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged</p> <p>01/28/2020 09:25 AM</p>	<p>Finding: The Public Release did not include the required information.</p> <p>Corrective Action: Provide a statement of understanding that the Public Release template found on the DPI website will be used moving forward to ensure all required information is included (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/2019-20-dpi-public-release.docx).</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	

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Corrective Action History	Flagged 01/28/2020 10:02 AM	<p>Finding: Annual civil rights training was provided to program staff in August 2019. However, the training presentation used was for CACFP and not for the USDA School Nutrition Programs. While much of the content overlaps, there are some specific civil rights topics that differ for the school nutrition programs. For this reason, it is essential that the appropriate presentation be used for the annual training.</p> <p>Corrective Action: Submit a statement describing how the correct training presentation will be used going forward. It is strongly recommended to download a new copy of the presentation directly from the DPI School Nutrition Civil Rights webpage annually to ensure the correct information is being used (https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#crtraining). There is also a recorded webcast of the civil rights training available (https://dpi.wi.gov/school-nutrition/training/webcasts#civil%20rights).</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/28/2020 10:36 AM	<p>Finding: The current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). Specific language is lacking in the following areas: public involvement, food and beverage marketing, nutrition promotion (including Smarter Lunchroom techniques), triennial assessment, and how the public will be updated/informed about policy updates and implementation. Additionally, it is strongly recommended to strengthen the policy language regarding policy leadership, school meals, and foods provided but not sold. Please reference the Local Wellness Policy webpage for resources that can aid in policy updates, including the Local Wellness Policy Checklist and the Local Wellness Policy Builder (https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy).</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.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/10/2020 11:28 AM	<p>Finding: There were 10 students in the benefit review sample, and an additional two students outside of the review sample, that were 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 on applications also list the program name. Because these applications were approved without obtaining the program name, they are considered incomplete. The error percentage is below the threshold that would require an independent 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>There was one additional student who was approved for free benefits via case number application that did not have the assistance program name listed. This would also be considered an error since the initial application is considered incomplete without the program name. However, it was found that this student shares a household with a different student who was an S code match on direct certification on 9/7/19, which can extend to other students in the household. For this reason, this additional student approved via case number without a program name is not recorded as an error as their benefit can be substantiated through a direct certification extension. In the software system, this student should be listed as free eligible based on this direct certification extension.</p> <p>Corrective Action: Each of the affected households must be contacted to obtain the assistance program name for the case number provided.</p>

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		<p>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 somewhere in the students' records to prove that their meal benefit application is complete and correctly approved. Most of the case numbers on the applications listed are 10 digit case numbers, which is the length of a valid Food Share or TANF case number. However, the case number provided for one of the students is a 16 digit case number which is not a length that is legitimate for any of the eligible assistance programs. This household may have provided the number from their EBT card instead of their Food Share/SNAP case number. When this family is contacted, a 10 digit case number and program name will need to be obtained to support the free benefit.</p> <p>If the program name the household provides is for an ineligible program (such as Medicaid, Badger Care, WIC, etc.), the household will need to complete an application with income information and be approved based on income in order to keep their free benefit. If the household does not wish to complete an application or completes an application but is approved for reduced-price benefits or is denied, the determining official must send a notice of adverse action. 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. The letter must also advise of the change in benefits; reasons for the change; an appeal must be filed within the 10 calendar days advance notice period to ensure continued benefits while awaiting a hearing and decision; instructions on how to appeal; and the household may reapply for benefits at any time during the school year. A template adverse action is available under the Documents tab of SNACS. Additional information about adverse action is available in the Eligibility Manual (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).</p> <p>To satisfy this corrective action, please submit the information obtained for each household that supports their free meal benefit. If necessary, upload copies of adverse action letters sent to households that are found not to qualify via case number.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	127	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/10/2020 11:48 AM</p>	<p>Finding: The online meal application used by the SFA does not allow households to enter in the assistance program name that corresponds with a case number. Further, the determining official did not reach out to households who submitted online applications to manually obtain the program names for case number applications. Since the school year 2018-19, the state of Wisconsin requires that all case numbers on applications also list the program name to be considered complete.</p> <p>Corrective Action: Submit a statement describing how program names will be obtained for case number applications submitted electronically. This may include changing settings in the software system so that households are prompted to enter the program name when they type in their case number. A document with directions on how to tweak these settings in the software system has been uploaded in SNACS for reference.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	134	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 02/10/2020 01:09 PM</p>	<p>Finding: 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, three months after the initial match, and again six months after the initial match (7 CFR 245.6).</p>

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Site Name		
Form Name	Verification (207 - 215)	
Question #	207	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/10/2020 01:37 PM</p>	<p>Finding: The verification collection report (VCR) requires correction. The SFA included students in the counts on the VCR that do not have access to the meal programs. On the VCR, only enrolled students with access to breakfast and/or lunch should be counted in the "number of students" sections. This includes section 1-1 B, section 3, section 4, and section 5-8.</p> <p>Corrective Action: The VCR will need to be unlocked by DPI for SFA editing. Once the report is unlocked, log in to online services and resubmit a corrected version of the report. Please ensure that only enrolled students with access to meals are recorded in the various sections of the VCR.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	214	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 02/10/2020 02:29 PM</p>	<p>Finding: The SFA did not provide ten calendar days' notice to the household(s) when benefits were decreased as a result of verification (7CFR 245.6a).</p> <p>Corrective Action: Submit a statement of understanding that ten calendar days must be provided to households prior to decreasing benefits (i.e. adverse action) as a result of verification. Please reference the Verification section of the Eligibility Manual for additional guidance on adverse action requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).</p>
Site Name		
Form Name	Meal Counting and Claiming (314 - 316)	
Question #	314	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 02/10/2020 03:01 PM</p>	<p>Finding: The adult meal price listed on the contract (\$3.60) and advertised on the school website does not reflect the price currently charged to adults (\$3.75).</p> <p>Additionally, Templeton Middle School (TMS) was listed as "not in program" for the Elderly Nutrition Improvement Program (EN). SFAs operating the EN must offer the program at all junior and senior high schools, and the paper contract on file indicated EN is offered at TMS and HHS. While elderly participants do not choose to eat at TMS, TMS does technically need to be "in program" and be open to program participants that wish to eat there.</p> <p>Corrective Action: Update the online contract to reflect the current adult lunch price and to indicated TMS is "in program" for EN. <i>Corrected on-site; no further action required.</i></p>
Site Name		

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Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 02/10/2020 12:21 PM</p>	<p>Finding: The correctly formatted full non-discrimination statement was not properly included on all program materials. On the direct certification (DC) notification letter, the statement's formatting was altered. However, the statement must be included with all of its original phrasing and spacing.</p> <p>Corrective Action: Update the DC letter template so that it includes the correctly formatted, full non-discrimination statement. Upload a copy into SNACS. <i>Corrected on-site; no further action required.</i></p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/28/2020 11:05 AM</p>	<p>Finding: The professional standards training tracker used for most staff members does not contain all of the required information. The tracker does not contain each employee's hire date, position/role, or the number of required training hours.</p> <p>Corrective Action: Please update the tracker so that it contains all of the missing information. Upload the updated tracker in SNACS as a document.</p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1402	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 02/07/2020 11:19 AM</p>	<p>Finding: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American Non-Compliant Product List or SFA equivalent:</p> <ul style="list-style-type: none"> ● Pineapple ● Mandarin oranges ● Cucumber (Mexico) ● Bell pepper (Mexico) <p>Further information can be found in Buy American in a Nutshell (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf).</p> <p>Corrective Action: Please submit a copy of completed non-domestic documentation for products. Tracking templates are available for download (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).</p> <p>Additionally, begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. Provide a copy of the form(s) that will be used and include any noncompliant products.</p>
Site Name		
Form Name	Reporting and Recordkeeping (1500 - 1501)	
Question #	1501	
TA Log #	No TA Log# found	

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Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 02/10/2020 02:34 PM</p>	<p>Finding: The SFA did not maintain all program records and documentation for three years plus the current school year (7 CFR 210.23(c)). Copies of all communications with the households selected for verification were not retained. The verifying official was able to provide the verification template letters, but did not have copies of the actual communications sent to the specific households.</p> <p>Corrective Action: Provide a statement of how the records retention requirements will be met moving forward. Please reference page 114 of the Eligibility Manual for additional information on verification records retention requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).</p>
Site Name	Silver Spring Intermediate Sch	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 02/06/2020 02:42 PM</p>	<p>Finding: No more than 2.0 ounce equivalents of grain-based desserts can be offered per week at lunch. During the week of review, 5.5 oz eq grain based desserts were offered at lunch. See Exhibit A, super script 3 and 4, for the listing of grain based desserts (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf). Graham crackers, cookies, breakfast pastries and banana bread are all grain-based desserts.</p> <p>Corrective Action: Submit a statement that explains a plan to reduce the amount of grain-based desserts offered at lunch.</p>
Site Name	Hamilton High School	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1104	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 02/06/2020 02:52 PM</p>	<p>Finding: The corner store sells non-compliant Sunchips and Motts fruit snacks. The Sunchips contain more than 200mg sodium per serving. The fruit snacks do not meet a general nutrient standard (the first ingredient must be whole grain rich, a fruit, vegetable, dairy product, or protein food).</p> <p>Corrective Action: State what will be done with these products to comply with the Smart Snack regulations.</p>
Site Name	Silver Spring Intermediate Sch	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1104	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 02/06/2020 02:46 PM</p>	<p>Finding: The reimbursable hot meal includes the salad bar. The reimbursable cold meal does not include the salad bar, but is sold a la carte at a unit price. The salad bar includes fresh vegetables, one packet of ranch dressing, hard boiled eggs, and a soufflé cup of shredded cheese. The salad bar does not meet Smart Snacks standards when bundled and sold a la carte. Consider the following:</p> <ul style="list-style-type: none"> Ranch could be a condiment for all students, but must be included in dietary specifications

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		<ul style="list-style-type: none"> • Vegetables, eggs, and cheese can be sold a la carte individually • Vegetables, eggs, and cheese could be given away free of charge, but must be included in dietary specifications (not recommended) • Vegetables and eggs OR cheese can be bundled and sold a la carte • Vegetables, eggs, and cheese can be credited towards all reimbursable meals when included in the meal price • With the addition of grain, the salad bar could be an independent entrée option <p>Corrective Action: Submit a statement that explains the plan to make the salad bar either Smart Snack compliant or part of all reimbursable meals.</p>
Site Name		
Form Name	Elderly Nutrition Program	
Question #	4	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/11/2020 11:14 AM</p>	<p>Finding: It does not appear that the all revenues and expenditures for the Elderly Nutrition Improvement Program (EN) are being recorded correctly. The Annual Financial Report (AFR) shows a revenue for EN via operating transfer that covers the full year's expenses for the program. On the AFR, there are no expenses broken out for EN. The AFR must show the revenues and expenses for each program broken out separately. Revenues should reflect the reimbursement received, the payments collected from participants, and any operating transfers (if necessary).</p> <p>Review of documentation and discussions with the assistant superintendent of business services suggested that all revenues for the EN are being funneled through Fund 80 (and possibly Fund 10) and then transferred into Fund 50 to cover the EN expenses incurred by Fund 50. Since 2004, it has been required to record all revenues and expenditures in Fund 50. Please reference the following:</p> <ul style="list-style-type: none"> • EN Application/Agreement (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) • DPI Auditor Listserv (see SNACS documents for copy) <p>Corrective Action: Please investigate the current procedures for accounting for EN, including where the reimbursement is deposited. Submit a statement describing how the financial accounting for EN will be modified going forward to be compliant with state regulations, and how EN revenues and expenditures will be correctly reported on the AFR.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/11/2020	1622	305	Administrative Review	ALL				
Comments								
Unpaid Meal Charge Policy					Created By		Created Date	
<p>It is recommended to revise the unpaid meal charge policy and procedures. Corrective action has been requested to bring the policy into compliance with USDA alternate meal requirements. However, there are some additional considerations. The SFA should consider claiming the first two lunches charged to the emergency fund for reimbursement and charging the students for these meals at their normal lunch price. The SFA is missing out on reimbursement dollars by not claiming these meals. Additionally, charging the emergency fund (and thus the households via repayment to the fund) the adult lunch price is further increasing the financial burden on the household. It is recommended to review the USDA resource "Overcoming the Unpaid Meal Challenge" for additional ideas on handling unpaid meal charges (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-29-2017a2.pdf).</p>							2/11/2020 10:45:28 AM	
02/11/2020	1609	1211	Administrative Review	ALL				

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Comments					Created By	Created Date
Professional Standards Job Positions						
<p>Each SFA must have one person designated as the "food service director." This person must meet the minimum hiring standards for new directors (if hired after July 1, 2015) and must complete 12 hours of professional standards training annually. A staff member could be considered the food service director (FSD) for DPI School Nutrition purpose but have a different job title within the school. The "manager of food and nutrition services" in the district is considered the "food service director" for DPI purposes and must complete 12 hours of training annually.</p> <p>The "assistant manager of food and nutrition services" and "head cook" could be considered "managers" for DPI purposes, which would require 10 annual hours of training annually. Please reference the USDA Professional Standards Q&A for more information on job position designation (https://fns-prod.azureedge.net/sites/default/files/resource-files/SP05-2020os.pdf).</p> <p>As a reminder, in the school nutrition programs, "full time staff" work 20 or more hours per week in food service and must complete six hours of training annually. "Part time staff" work less than 20 hours per week in food service and must complete four hours of training annually. Please reference the "In a Nutshell: Training Requirements" resource for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf).</p>						2/11/2020 9:21:15 AM
02/11/2020	1606	811	Administrative Review	Hamilton High School		
Comments						
"And Justice for All" Posters						
<p>The "And Justice for All" posters were displayed prominently in the review sites. However, some of the posters were the new version of the poster (with the USDA building picture) and some were the old version of the poster (with the Statue of Liberty). New, updated posters are available for order through the DPI School Nutrition Team. These new posters should replace the old ones in all schools. Please order new posters as needed and update them in the school cafeterias. Orders can be placed here:</p>						2/11/2020 9:07:30 AM
02/11/2020	1605	803	Administrative Review	ALL		
Comments						
Civil Rights Complaint Procedures						
<p>The SFA has several policies that address discrimination complaints. However, these procedures do not speak specifically about how the SFA will handle complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. There are specific actions SFAs must take for these types of complaints. Please review the Civil Rights webpage and work towards adopting procedures that comply with the requirements (https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#complaints).</p>						2/11/2020 8:58:26 AM
02/11/2020	1604	1600	Administrative Review	ALL		
Comments						
Implementing a School Breakfast Program						
<p>The SFA currently does not offer breakfast at any schools. It is highly encouraged to explore the feasibility of offering breakfast and research the various service models. Offering breakfast can be an excellent way to ensure students begin the day with a nutritious meal and are ready to learn. Further, breakfast programs can generate additional revenue for the food service account. Please reference the School Breakfast Program webpage for information about starting a breakfast program (https://dpi.wi.gov/school-nutrition/programs/school-breakfast). Please contact the School Nutrition Team with any questions regarding adding this program (https://dpi.wi.gov/school-nutrition/directory). There is a team of breakfast specialists that can answer any questions and assist in planning and troubleshooting.</p>						2/11/2020 8:56:57 AM
02/11/2020	1603	1003	Administrative Review	ALL		
Comments						
Involvement in the Local Wellness Policy						
<p>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).</p>						2/11/2020 8:49:01 AM
02/11/2020	1602	1000	Administrative Review	ALL		

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Comments								
Triennial Assessment of the Local Wellness Policy					Created By		Created Date	
<p>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.</p> <p>The Wellness School Assessment Tool (WellSAT) allows SFAs to evaluate how their policy compares to a model policy (http://www.wellsat.org/default.aspx). 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).</p> <p>The Local Wellness Policy Report Card 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 (https://docs.google.com/a/dpi.wi.gov/forms/d/1u6LUEy3Vd_sTU-s8fq0EYc-UscxZK-edIFq28WtqSIU/edit?usp=drive_web). 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.</p> <p>If fully completed, the report card meets all requirements of the triennial assessment. Please visit the Local Wellness Policy webpage for more information (https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy).</p>							2/11/2020 8:35:26 AM	
02/11/2020	1601	1211	Administrative Review	ALL				
Comments								
Training for School Staff Members					Created By		Created Date	
<p>All school staff members with duties directly related to the school nutrition programs should complete annual civil rights training and annual professional standards training hours (based on the number of hours per week worked in food service). Substitute food service workers should complete civil rights training and four hours of annual professional standards training, which should be recorded on a tracking tool. As a reminder, civil rights training can be counted in the annual professional standards training hours.</p>							2/11/2020 8:33:36 AM	
02/11/2020	1600	207	Administrative Review	ALL				
Comments								
Verification Documentation					Created By		Created Date	
<p>For one of the verified applications, the verifying official accepted income documentation that was lacking some information. The household submitted a screen shot of their pay summary (not a detailed pay stub) and a letter from the employer that stated the employee's annual income. These documents did not show the date or frequency of the income. Going forward, please ensure all verification documentation contains all of the necessary information before accepting the documentation. Please reference the Verification section of the Eligibility Manual for more details on acceptable documentation (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).</p>							2/11/2020 8:28:32 AM	
02/11/2020	1599	141	Administrative Review	ALL				
Comments								
Benefit Extension Address Match Report					Created By		Created Date	
<p>There is a report and setting in the software system that matches students based on address for extension of direct certification benefits. While this report may accurately extend benefits most of the time, it is possible that an address match could be incorrect if families move and do not update their address or are matched by apartment building. For this reason, address matches that pull on this extension of benefits report should be double checked for accuracy.</p> <p>During the review, there were two students who were given benefits via extension based on an address match. These students and the students their benefits were extended from were listed at the same address but under different payors. It was determined that these children were all part of the same household and the extension was correct. However, there may be cases when this is not true. When children are listed at the same address but under different payors, it should be investigated if the children are part of the same household/economic unit, as defined in the Eligibility Manual (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf). It is possible for children to share an address but be considered part of two separate households for meal benefit purposes.</p>							2/11/2020 8:21:10 AM	

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02/11/2020	1598	208	Administrative Review	ALL				
Comments								
Confirmation Review				Created By		Created Date		
While a confirmation review was completed, it is recommended to improve the documentation process for the confirmation review. Currently, the confirming official/authorized representative signs on the software-generated verification report after the full verification process is completed. The confirming official should somehow document that each individual application selected was confirmed and the date it was confirmed. There is a verification tracking tool on the Verification webpage that can be used to help ensure that each step in the verification process is completed and documented (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form.docx).						2/11/2020 8:14:53 AM		
02/11/2020	1597	207	Administrative Review	ALL				
Comments								
Verification Reports in Software System				Created By		Created Date		
When the verifying official conducted verification, several software reports were run to aid in the process. Two different reports in the software system showed two different numbers of applications on file as of October 1 (84 vs 86). This discrepancy between reports should be investigated to ensure accurate verification pool, sample, and reporting going forward. Discrepancies in the number of approved applications as of October 1 could result in an incorrect verification sample size.						2/11/2020 8:10:06 AM		
02/11/2020	1596	1408	Administrative Review	Silver Spring Intermediate Sch				
Comments								
Temperature Logs				Created By		Created Date		
When reviewing the temperature logs for Silver Spring Intermediate, it was noted that cooler and freezer temperatures for several days in January were not recorded. This was the only noted instance of missing temperature records. The missing temperatures were discussed with the site manager, who indicated that a plan will be developed to ensure all temperatures are recorded daily even when the staff member that typically records temperatures is absent from work. Please ensure that all temperatures are recorded daily.						2/11/2020 8:05:53 AM		
02/11/2020	1595	1500	Administrative Review	ALL				
Comments								
Reporting Student Enrollment and Counts				Created By		Created Date		
As a reminder, only students enrolled in the district with access to the National School Lunch Program should be included in enrollment numbers or student counts on school nutrition reports. This includes on monthly claims and the verification collection report. Students that do not attend classes in the district or do not have access to meals (such as 4K) should not be included in counts on these reports.						2/11/2020 8:00:39 AM		
02/11/2020	1594	306	Administrative Review	ALL				
Comments								
Edit Checks				Created By		Created Date		
The claim preparer uses the meal counts on the edit check report to complete the monthly claim. However, the claim preparer also takes extra steps to compare other software reports and uses a different report to obtain the highest free/reduced-price/paid eligible students. The monthly school edit check reports alone can be used to complete online claims because it contains all of the necessary information. The highest approved students in each benefit category on the edit check report is set to only include enrolled students with access to meals. Other eligibility reports in the software system contain students that may not have access to meals, and thus those reports would not provide the most accurate enrollment and "highest approved" counts.						2/11/2020 7:54:03 AM		
02/10/2020	1590	305	Administrative Review	ALL				
Comments								
A la Carte Pricing				Created By		Created Date		
As a reminder, any items sold to students outside of the reimbursable meals must be charged individually at a la carte prices. Second bundled meals cannot be sold to students as a unit because this would not meet the Smart Snacks standards. It was observed that the cashiers do a good job ensuring students first receive a reimbursable meal and then are charged a la carte prices for any additional items (such as extra entrees). Because the extra pizza slice is the same price as a normal paid meal (and is more expensive than any						2/10/2020 3:21:04 PM		

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other extra entrée), it is recommended to create a separate "extra pizza slice" button on the POS screen. This would allow staff to easily charge students the appropriate price for extra pizza without the confusion of having to hit the "lunch \$2.95" button twice. Adding the pizza button would also aid in tracking the number of extra slices purchased.							
02/10/2020	1589	709	Administrative Review	ALL			
Comments							
Non-Program Food Revenue Tool				Created By		Created Date	
The food service director (FSD) annually completes the DPI non-program food revenue tool to assess compliance with the revenue requirements, which is excellent. The FSD also uses the tool to help determine what a reasonable selling price is for catering items, such as cookies and coffee. While the tool can be used to aid in pricing catering items (as it automatically calculates a selling price based on a 38% food cost), sporadic catering sales do not need to be included in the tool when it is completed annually for the five day reference period. Regular non-program food sales, such as weekly vending of meals to private schools, should be included in the tool since these sales occur on a weekly basis. Please reference USDA memo SP 20-2016 for additional information about catering and non-program food sales (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf).						2/10/2020 3:08:45 PM	
02/06/2020	1575	1104	Administrative Review	Hamilton High School			
Comments							
Sugar-Free Gum Sales				Created By		Created Date	
Sugar-free gum is Smart Snack compliant.						2/6/2020 2:53:13 PM	
02/06/2020	1574	409	Administrative Review	Hamilton High School			
Comments							
Production Records				Created By		Created Date	
Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. They must be kept for a garden or salad bar. Production record templates for garden bars and salad bars are available on the Production Records webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).						2/6/2020 2:50:29 PM	
02/06/2020	1573	409	Administrative Review	Hamilton High School			
Comments							
Fruit Servings				Created By		Created Date	
There are a few days when there appears to be a fruit shortage (only ½ cup offered). However, fruit was offered elsewhere in the service line, and daily requirements are met. It is required that all items offered are recorded on daily production records. It is recommended to offer ½ cup portions of two different fruits daily.						2/6/2020 2:50:06 PM	
02/06/2020	1572	1104	Administrative Review	Silver Spring Intermediate Sch			
Comments							
Smart Snacks				Created By		Created Date	
All entrees, snacks, and sides must meet one of the general standards and all of the nutrient standards. Exemptions include entrees sold day of and day after service, milk, and fresh/frozen/canned fruits and vegetables without added ingredients. Other items on the menu, such as hash browns and dinner rolls, must meet Smart Snack standards to be sold a la carte.						2/6/2020 2:47:09 PM	
02/06/2020	1571	410	Administrative Review	Silver Spring Intermediate Sch			
Comments							
Applesauce Crediting				Created By		Created Date	
Musselman's Strawberry Applesauce Squeeze (3.17 oz) is less than ½ cup fruit. There were other forms of fruit available on the day that it was served, so there was not a fruit shortage. In the future, know that this product does not credit as ½ cup of fruit, and therefore cannot credit as the ½ cup fruit/vegetable required to make a reimbursable meal.						2/6/2020 2:42:35 PM	
01/28/2020	1458	1601	Administrative Review	ALL			

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Comments					Created By	Created Date
Summer Food Service Program Outreach						
<p>While the SFA met the Summer Food Service Program outreach requirements by providing information on the food service webpage, it is highly encouraged to conduct additional outreach to inform families where their children can receive free meals in the summer. For example, some of the resources shown below could be included in a parent email blast or end-of-the-year newsletter in May or June:</p> <ul style="list-style-type: none"> Locate a site on the Summer Meals Map which will be updated weekly throughout the summer (https://batchgeo.com/map/6e9629191e3ca6b658781f649fd5c9f7) Call 2- 1-1. 2-1-1 is a free, easy-to-remember phone number connecting callers with health and human services in their community. Text 'food' to 877-877 						1/28/2020 11:08:36 AM
01/28/2020	1440	1000	Administrative Review	ALL		
Comments						
Local Wellness Policy Resources						
<p>As the district works on updating and improving the wellness policy, it is recommended to review the resources on the Local Wellness Policy webpage (https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy). Of particular interest may be:</p> <ul style="list-style-type: none"> The Local Wellness Policy Builder which contains sample language that can be used when updating a policy The Local Wellness Policy Checklist which provides a summary of required content areas that must be included in the policy 						1/28/2020 10:37:46 AM
01/28/2020	1434	801	Administrative Review	ALL		
Comments						
Public Release						
<p>There is specific information that is required to be included in the public release, including the free and reduced-price income eligibility guidelines. The public release sent out by the SFA does not contain all of the required information. Please reference pages 8-13 of the Eligibility Manual for a full description of the requirements. Using the DPI public release will ensure the SFA meets all of these requirements.</p> <p>The public release must be sent out annually to local media outlets, grassroots organizations major employers contemplating or experiencing large layoffs, and local unemployment offices. The SFA must ensure that the places the public release is sent are documented, including grassroots organizations. Grassroots organizations are local agencies that serve members of the community that may benefit most from the school meals programs (such as food banks, WIC clinics, etc.).</p>						1/28/2020 9:43:02 AM