

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

SFA Name: Muskego-Norway School District

Administrative Review Conducted on: January 12-13, 2017

Sites Selected for Review: Lake Denoon Middle School
Lakeview Elementary School

Commendations & Suggestions

There is a nice variety of fruits and vegetables offered throughout the week. The menus are planned well to keep interest amongst the students.

All of the meal benefit applications, direct certification lists, and verification files were very organized and very easy to go through. Staff should be commended for their efforts and dedication to keeping everything in order.

All staff were very helpful in answering all questions throughout the review and very accommodating.

Both reviewed kitchens were in good order, clean and organized. Staff worked well together for smooth meal services.

It is evident that there is a strong effort to ensure all USDA requirements are being followed.

Other areas of Technical Assistance (NOT requiring Corrective Action)

Menu Review- Additional technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.

Meal Benefit Applications- Any additional information added and/or changed on meal benefit applications should have the date, the person who was contacted, and the person's initials by the comment.

Food Safety- The milk crates should be off of the floor in the walk in refrigerator at the middle school.
Elementary- All items should be dated in the freezers. This includes cases and bags of food from cases.

Wellness Policy- The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit. This can be accessed electronically at <http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>.

Professional Standards- On the training trackers, put the type of employee and the number of required hours.
For example : Food Service Director: 12 hours

Verification- the SFA should use the total gross income for verification. The eligibility status did not change and no further action is required.

Non-Discrimination Statement- Notification letter to the households has an outdated statement on the bottom as of October 2016. At some point between October and the day of the review, the software company already made the change t the current correct statement. No further action is required. The SFA was informed that there was an outdated statement before and to be aware and always check templates for the correct statement.

Date Corrective Action Plan was provided to SFA:

2/3/2017

Due Date for Corrective Action Plan:

3/3/2017

The following pages address the findings that were identified during your Administrative Review.

For each finding you will be presented with the following:

The finding, and details specific to the SFA regarding the finding

A summary of the regulation / requirement

The Code of Federal Regulations citation number or alternate resource citation

Suggested guidance for the SFA in order to achieve compliance

SFA area for reply to state how, when and by whom corrections will be made

Please provide a detailed response to each finding in the spaces provided.

Finding #1
410- For the week of menu review, the K-5 and 6-8 lunch menus did not meet the minimum daily requirement of 1 ounce equivalent meat/meat alternate. A meat/meat alternate was provided, however the minimum required portion size was not met.
Technical Assistance Provided
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/
Regulation / Citation and Summary
210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: 1 oz. equivalent meat/meat alternate.

SFA Suggested Guidance for Compliance
<p>To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.</p>
SFA Response

Finding #2
<p>410- For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalents meat/meat alternate. For the week of menu review, the 6-8 lunch menu did not meet the minimum weekly requirement of 9 ounce equivalent meat/meat alternate.</p>
Technical Assistance Provided
<p>During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for meat/meat alternates required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/</p>
Regulation / Citation and Summary
<p>210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-5: minimum of 8 oz. equivalent of meat/meat alternate per week. 6-8: minimum of 9 oz. equivalent of meat/meat alternate per week.</p>
SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for meat/meat alternates are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #3

126. Not all selected applications were approved correctly. The SFA did not base its determination on all sources of income listed on the application.

Technical Assistance Provided

During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the household has listed the amounts, source, and frequency of current income for each household member; otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining the total household income the SFA must use all income provided on the application.

Regulation / Citation and Summary

245.6(c)(4) Calculating income. The local educational agency must use the income information provided by the household on the application to calculate the household's total current income. When a household submits an application containing complete documentation, as defined in §245.2, and the household's total current income is at or below the eligibility limits specified in the Income Eligibility Guidelines as defined in §245.2, the children in that household must be approved for free or reduced price benefits, as applicable.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for determining applications, the SFA must provide the State Agency with an assurance that staff administering the free and reduced lunch program understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. Applications found to be incorrectly determined during the review must be corrected, and the corrected application and date of the correction must be submitted to the State Agency. If the SFA is unable to correct the error because of missing/incomplete information from the household, after allowing the household an adequate amount of time to respond, the SFA must send a letter of adverse action and advise the State Agency of the date that this letter was sent.

SFA Response

Finding #4

208. The SFA does not have documentation demonstrating that a confirmation review took place.

Technical Assistance Provided

During the review, documenting the confirmation review was discussed with the SFA. The SFA must conduct confirmation reviews and maintain documentation that these took place.

Regulation / Citation and Summary

245.6a(e) Activities prior to household notification—(1) Confirmation of a household's initial eligibility. (i) Prior to conducting any other verification activity, an individual, other than the individual who made the initial eligibility determination, shall review for accuracy each approved application selected for verification to ensure that the initial determination was correct. (ii) The requirements in paragraph (e)(1)(i) of this section are waived if the local educational agency is using a technology-based system that demonstrates a high level of accuracy in processing an initial eligibility determination based on the income eligibility guidelines for the National School Lunch Program.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for documenting confirmation reviews, the SFA must provide the State Agency with an assurance that staff conducting verification understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance that includes the person(s) by position(s) who will be completing the confirmation reviews and plan to the State Agency.

SFA Response

Finding #5
214. The SFA did not decrease benefits within the 10 operating days from the final decision and date letter of adverse action is sent to the household.
Technical Assistance Provided
During the review, updating eligibility that changed due to verification was discussed with the SFA. The SFA must decrease benefits changing because of verification no later than 10 calendar days from the final decision and the date the letter of adverse action is sent.
Regulation / Citation and Summary
245.6a(f)(7) Eligibility changes. Based on the verification activities, the local educational agency shall make appropriate modifications to the eligibility determinations made initially. 245.6a(j) Adverse action. If verification activities fail to confirm eligibility for free or reduced price benefits or should the household fail to cooperate with verification efforts, the school or local educational agency shall reduce or terminate benefits, as applicable, as follows: Ten days advance notification shall be provided to households that are to receive a reduction or termination of benefits, prior to the actual reduction or termination. The first day of the 10 day advance notice period shall be the day the notice is sent.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for updating eligibility that has changed due to verification, the SFA must provide the State Agency with an assurance that staff conducting verification understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. Also, please provide evidence that the appropriate student status(es) has/have now been updated, as well as the date that they were changed, if applicable.
SFA Response

Finding #6
1005. An assessment of the Local School Wellness Policy has not been completed.
Technical Assistance Provided
During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.
Regulation / Citation and Summary
210.30 Local School Wellness Policy (e) Implementation assessments and updates. Each local

educational agency must: (1) Designate one or more local educational agency officials or school officials to ensure that each participating school complies with the local school wellness policy; (2) At least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public. The assessment must measure the implementation of the local school wellness policy, and include: (i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and (iii) A description of the progress made in attaining the goals of the local school wellness policy.

(3) Make appropriate updates or modifications to the local school wellness policy, based on the triennial assessment.

SFA Suggested Guidance for Compliance

To come into compliance with this requirement the SFA must submit a statement that and assessment of the wellness policy will be completed by the wellness committee. In addition to the statement the SFA must submit the minutes from the meeting that was held to complete the assessment. If the assessment has been updated by the corrective action due date, submit a copy of the assessment report. If the due date is prior to the completion of the assessment, submit a detailed timeline for the completion of the assessment. Once it is completed copy of the assessment should be submitted to the state agency for review.

SFA Response

Finding #7

1601. The SFA has not performed SFSP outreach.

Technical Assistance Provided

It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.

Regulation / Citation and Summary

210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.

SFA Suggested Guidance for Compliance

To come into compliance with this requirement, the SFA must submit an assurance to the State Agency that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.

SFA Response

Finding #8
<p>Resource Management Comprehensive Review - Nonprogram Foods: Prior to this review, the SFA did not determine compliance with nonprogram food revenue requirements using the USDA NonProgram Food Revenue Tool or the DPI NonProgram Food Price Calculator. During the review the tool was completed by the SFA, but errors were found on the tool.</p>
Technical Assistance Provided
<p>Prior to the review, the SFA had not determined compliance with nonprogram food revenue requirements. During the review the SFA completed and submitted the tool. However, the tool was only completed for two sites, rather than for the whole district. The NonProgram Food Revenue Tool (or DPI's NonProgram Price Calculator Tool) should be completed every year, as one tool for the entire district. You can use a one-week reference period instead of gathering numbers for an entire year. This tool should include adult meals, a la carte, extra entrees, and extra milks as your nonprogram foods. If the tool shows you are out of compliance, you need to increase nonprogram food prices (even if you are meeting the USDA adult meal pricing guidelines). The SFA must correct and resubmit the tool as part of their corrective action response.</p>
Regulation / Citation and Summary
<p>7 CFR 210.14 (f) Revenue from non-program foods. Beginning July 1, 2011, school food authorities shall ensure that the revenue generated from the sale of non-program foods complies with the requirements in this paragraph.</p> <p>(1) Definition of non-program foods. For the purposes of this paragraph, non-program foods are those foods and beverages; (i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account.</p> <p>(2) Revenue from non-program foods. The proportion of total revenue from the sale of non-program foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining non-program foods (ii) The total costs associated with obtaining program and non-program foods from the account.</p>
SFA Suggested Guidance for Compliance

As the corrective action response, please explain the process that will be put into place to ensure that the USDA Nonprogram Food Revenue Tool or the DPI NonProgram Price Calculator Tool is completed each year. This should include a timeframe for when the tool will be completed, the name by position of the person responsible for completing the tool, and the steps that will be taken if the tool shows you are out of compliance. Additionally, submit a corrected copy of the tool. If the tool shows you are out of compliance, include a plan to increase nonprogram food prices.

SFA Response

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