

Administrative Review Report

Muskego-Norway School District

Review Schedule:

| Schedule Type | Start Date | End Date |
|--------------------------|------------|------------|
| Off-Site Review | 11/10/2022 | 12/14/2022 |
| On-Site Review | 01/23/2023 | 01/24/2023 |
| Site Selection Worksheet | 09/01/2022 | 09/30/2022 |
| Entrance Conference | 01/23/2023 | 01/23/2023 |
| Exit Conference | 01/24/2023 | 01/24/2023 |

Commendations:

Our sincere thanks to the administration and school nutrition professionals of Muskego-Norway. We appreciate your time and efforts spent preparing for and participating in the administrative review process. Thank you for being available during the on-site portion of the review and helping us to gather the needed documentation and information. Thank you for serving healthy, nutritious meals to your students! Your quick responses to actions needed were greatly appreciated!

Awesome job and thank you for what you do for kids!

Recommendations:

For information on the USDA Child Nutrition Programs, visit the DPI School Nutrition webpage. For in depth technical assistance, including program links see the 2022-23 General Program Reminders which has been uploaded to the documents tab in SNACS.

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT offers school nutrition summer training online and in various locations around the state. Find more information on these training opportunities on the DPI School Nutrition Training webpage (<https://dpi.wi.gov/school-nutrition/training>).

Findings and Corrective Action:

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| Form Name | Certification and Benefit Issuance (100 - 121) |
| Question # | 113 |
| TA Log # | TA Log# exists |
| Corrective Action Status | CAP Submitted |
| Corrective Action History | <p>Finding: SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. E ach item on the Sharing form must be listed separately. The SFA did not have written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, for each individual program such as athletic or testing fee waivers, registration fee waiver, school fees, CA Upload into SNACS an updated Sharing Information Form with all programs listed individually for which information is to be shared.</p> <p>The updated Sharing Form has been uploaded into the Documentation tab to include that only school registration fees will be waived based on free/reduced status.</p> |
| Form Name | Meal Counting and Claiming (300 - 311) |
| Question # | 306 |
| Corrective Action Status | CAP Submitted |

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| Corrective Action History | <p>Finding: The SFA allows the purchase of a second meal. Second meals are no longer permissible to be sold because a whole meal would not meet the Smart Snacks requirement. Meal items can be sold separately as non-program foods, if they comply with the SmartSnacks requirements. CA: Provide a statement of how individual items will be sold to students as nonprogram foods. Finding: Unpaid Meal ChargePolicy cannot say students "may" be permitted to accumulate negative food service balance. May is too ambiguous and may result in a civil rights violation. CA: Please update the policy to remove ambiguous language.</p> <p>Additional items after the reimbursable meal will be charged at the appropriate ala carte price. Proper cashier training will be reinforced.</p> |
| Form Name | Maintenance of Non-Profit School Food Service Account (700 - 705) |
| Question # | 701 |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Based on the SY 2021-22 Annual Financial Report, the nonprofit school food service account has a net cash resource in excess of 3 months average expenditures. CA: Submit a plan and timeline for reducing the net cash resources to below 3 months operating expenditures. Please note, a formal notification and report may also be required outside of the AR process.</p> |
| Form Name | Revenue From Non-Program Foods (709 - 711) |
| Question # | 709 |
| Corrective Action Status | CAP Submitted |
| Corrective Action History | <p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA completed the Nonprogram Foods Revenue Tool, but did not include all required information into the tool. Reimbursable meal information needs to be entered into the tool for accurate ratio calculation. (7 CFR 210.14). CA 1: Watch the Nonprogram Food Revenue webcast on the DPI website (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html). CA 2: Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.</p> <p>nonprogram revenue tool was completed and submitted.</p> |
| Form Name | Civil Rights (800 - 807) |
| Question # | 801 |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The Public Release was not distributed to the required locations. CA: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year. Provide a statement of understanding that the Public Release will be posted in the paper unless there is a charge.</p> |
| Form Name | Civil Rights (800 - 807) |
| Question # | 803 |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). CA: Provide a timeline for when a school meal program civil rights complaint policy</p> |

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| | will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance. |
| Form Name | Local School Wellness (1000 - 1006) |
| Question # | 1000 |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content, such as food sold outside of school meals must meet SMART SNACKS, Food and Beverage Marketing (7 CFR 210.31).</p> <p>CA: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance.</p> |
| Form Name | School Breakfast and Summer Food Service Program Outreach (1600 - 1601) |
| Question # | 1601 |
| Corrective Action Status | CAP Accepted |
| Corrective Action History | <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). CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.</p> <p>A "Summer Meal Site Finder" link has been added to our website https://www.muskegonorway.org/ (under Community).</p> <p>CAP Accepted</p> |
| Form Name | Certification and Benefit Issuance (124 - 142) |
| Question # | 126 |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>212 free and reduced price meal application determinations were reviewed, 7 errors were identified. Fiscal Action will be assessed for the application errors, but there is a \$600.00 threshold before a reclaim is necessary. Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). The households meal benefits were incorrectly calculated. See the SFA-1 provided by the consultant for details.</p> <p>CA: Notify the household of the correct meal benefit, per program requirements. Upload a copy of the letter to the household and documentation that the benefit issuance list has been updated into SNACS.</p> |
| Form Name | Verification (207 - 215) |
| Question # | 208 |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: SFA did not complete a confirmation review before verifying application(s). CA: Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.</p> |
| Form Name | Civil Rights (809 - 810) |
| Question # | 810 |

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| Corrective Action Status | Flagged |
| Corrective Action History | Finding: The correct non-discrimination statement was not on the Direct Certification (DC) notice to families or the Verification notice. CA: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated. |
| Site Name | Muskego Lakes Middle School |
| Form Name | Meal Components and Quantities - Review Period (409-412, 430-437) |
| Question # | 435 |
| Corrective Action History | <p>Finding: Standardized recipes are required for all menu items made in-house using more than one ingredient and should be site specific. The following recipes lacked information that was specific to Muskego-Norway operations : Beefy Nachos: The recipe states that there should only be 1.6 oz of tortilla chips provided, which would provide 1.5 oz eq grains but the crediting at the bottom of the recipe states that this recipe provides 2.0 oz eq grains. SFA states 21 chips are being served. Either the chip serving size or the crediting information should be updated to reflect that is actually being served. Chef Salad- Multiple deli ham and deli turkey were listed as options for deli meats. Please specify which deli meat option your site is using.</p> <p>Hamburger/Cheeseburger: Multiple cooking methods to prepare the entrees are listed on the recipe- which one is specific to your operation? Pepperoni Pizza- recipe doesn't mention placing pepperoni on pizza Popcorn Chicken Warrior Bowl: Recipes states two different portion sizes for meat and the production record states a third different portion size. Please specify the portion size for the popcorn chicken.</p> <p>Corrective Action : Submit updated standardized recipes for the Beefy Nachos, Chef Salad, Hamburger/Cheeseburger, Pepperoni Pizza and Warrior Bowl- Popcorn Chicken. Be sure to include all requirements of a standardized recipe that are site specific. Templates and other resources can be found on the Standardized Recipes webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p> |
| Site Name | Muskego Lakes Middle School |
| Form Name | Smart Snacks (1104 - 1107) |
| Question # | 1105 |
| Corrective Action Status | CAP Submitted |
| Corrective Action History | <p>Finding : The beverage product: Snapple Juice and Izze Sparkling Juice are not allowable at the elementary school level. Only plain water (all sizes), 100% juice/diluted juice (8 fluid ounces or less), or milk (8 fluid ounces or less) are allowable Smart Snack beverages in elementary schools. Since this school includes both elementary (5th grade) and middle school (6-8th grade) the beverages must meet requirements for the youngest age. More information can be found on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).</p> <p>Corrective Action : State what will be done with these products to comply with the Smart Snack regulations.</p> <p>Communication was sent to the middle school stating what is allowable at the 5th grade level. Signage was posted stating the above finding. As of 1/24/23, staff members (cashiers) were instructed to lock coolers that serve noncompliant products during 5th grade lunch. Food Service Manager is on site to answer any questions as they arise.</p> |

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| Site Name | Muskego Lakes Middle School |
| Form Name | Food Safety, Storage and Buy American (1404-1411) |
| Question # | 1411 |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Currently the SFA is keeping all non-compliant Buy-American food items listed on a general chart however the following information must be recorded on a Buy-American Non-Compliant Product List: Date, Name of Item, Country of Origin, Reason (Cost Analysis, Seasonality, Availability, Substitution, Distribution, Other)</p> <p>Corrective Action: The recommended Buy American - Non Compliant Product List template can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american). This has been corrected on-site.</p> |

Technical Assistance Entries:

Comments

At the point of service, staff were observed offering students a fruit when a reimbursable meal (entree containing 2 meat/meat alternate and 2 grain plus vegetable) was already on the student's tray. The addition of the fruit was not necessary and could increase food cost.

Comments

It is recommended to create more salad bar signage for items not pre-portioned. Some students took a smaller portion of lettuce/tomatoes that were questionable in regard to the amount needed for a reimbursable meal. DPI has a Salad Bar Signage Template that can be found on our Signage webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

Comments

Salad Bar Signage states 1 spoodle = 2 ounces or $\frac{1}{4}$ cup and 2 spoodles = 4 ounces or $\frac{1}{2}$ cup however spoodles placed in salad bar were 4 fluid ounce spoodles which could lead to confusion for students and staff by taking double portions when not necessary which ultimately leads to higher food cost.

Comments

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with staff on recording substituted food items with the corresponding portion size since this was inconsistent when production records were being completed.

Comments

The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Each item must be listed separately. Consent must be obtained each school year. Find the Sharing Information with Other Programs template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).

Comments

Second meals are no longer permissible to be sold because as a whole meal would not meet the Smart Snacks requirement. Meal items can be sold separately as non-program foods, if they comply with the Smart Snacks requirements.

Comments

Carryover is 30 operating days.

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Comments

A child or other household member's receipt of benefits from an Assistance Program automatically extends eligibility for free benefits to all children who are members of the household. [7 CFR 245.6(b)(7)] Foster child benefits do not extend to other students in a household.

- [Local Wellness Policy In a Nutshell](#) provides an overview of policy requirements.
- [Local Wellness Policy Checklist](#) is a resource that will help schools determine if all required content areas are included in their LWP.

As of June 30, 2020, SFAs must complete their first triennial assessment. **The assessment must be completed, at minimum, once every three years.** It requires SFAs to describe how the language in the SFA's LWP compares to the model LWP, measure the SFA's compliance with its LWP, and describe the SFA's progress toward meeting its LWP goals.

- [Local Wellness Policy Triennial Assessment Report Card](#) - **SFAs must use the Wisconsin Local Wellness Policy Triennial Assessment Report Card** in order to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two. Please note that the online version of the Wisconsin Local Wellness Policy Report Card has been discontinued. **The Triennial Assessment Report Card does not need to be submitted to the DPI School Nutrition Team.** The Triennial Assessment Report Card should be kept on file for your next DPI Administrative Review. In addition, the results of the triennial assessment should be made available to the public.

Local Wellness Policy Builder

[Local Wellness Policy Builder](#) is an online tool designed to assist schools/districts in creating comprehensive school wellness policies that meet the final rule established by the USDA in August 2016.

[Local Wellness Policy Builder - Full Text](#) is a compilation of all statements available in the [Local Wellness Policy Builder Online Tool](#).