

# Administrative Review Report

Iola-Scandinavia School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/19/2019	01/09/2020
On-Site Review	01/21/2020	01/22/2020
Site Selection Worksheet	11/19/2019	11/22/2019
Entrance Conference	01/21/2020	01/21/2020
Exit Conference	01/22/2020	01/22/2020

## Commendations:

### From the Nutrition Program Consultant (NPC):

Thank you to the staff at Iola-Scandinavia 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 quickly and 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 cafeteria was 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 food service director does an excellent job tracking professional standards training hours, approving free/reduced-price meal applications, and completing verification. There were no errors on the applications reviewed.

The district described recent improvements made to the local wellness policy, wellness committee, and establishment of district wellness goals. One of the primary goals stated for the next school year is starting a breakfast program at the high school—this is great news!

### From the Public Health Nutritionist (PHN):

Thank you to all staff at Iola-Scandinavia School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director for sending documentation ahead of the onsite visit in a timely manner and being responsive with communication; this greatly expedited the AR. The Food Service Director does a nice job keeping offering a variety of fresh fruits and vegetables as well as entree options daily. Ample signage is displayed around the cafeteria showing students how to select reimbursable meals and appropriate portion sizes. Iola-Scandinavia High School had a perfect week of review for lunch and all grains served were whole grain-rich (WGR)! Iola-Scandinavia Elementary School had a perfect week of review for breakfast and all grains were WGR! The Food Service Director incorporates Farm to School by offering local apples on the line, which benefits the community and students! Iola-Scandinavia School District does a great job tracking fundraisers and making sure all a la carte items sold are compliant. Thank you for serving healthy, nutritious meals to the students of Iola-Scandinavia School District!

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	700	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/10/2020 10:40 AM</p>	<p><b>Finding:</b> The expenditures and total balance reported on the 2018-19 Annual Financial Report (AFR) do not match the PI-1505. These reports must match. It appears that an expense of \$807.94 was recorded on the AFR, but was not on the PI-1505.</p> <p><b>Corrective Action:</b> Please investigate this discrepancy and update the AFR accordingly. Submit a copy of the updated AFR to the consultant. <i>Corrected prior to on-site review; no further action required.</i></p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/14/2020 09:20 AM</p>	<p><b>Finding:</b> The current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). Specific language addressing policy leadership and food/beverage marketing is lacking. Additionally, it is highly recommended to update language pertaining to public involvement and the triennial assessment to more closely align with the USDA requirements for these topics.</p> <p><b>Corrective Action:</b> 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>
<b>Site Name</b>		
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
<b>Question #</b>	1601	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/10/2020 01:15 PM</p>	<p><b>Finding:</b> 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><b>Corrective Action:</b> 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>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	138	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p>	<p><b>Finding:</b> The SFA is running students through direct certification (DC) that are not</p>

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	01/21/2020 05:12 PM	<p>actively enrolled in and attending school in the district and do not have access to meal programs. Per the <a href="#">DC manual</a>, SFAs may not run students through DC that are open enrolled to other districts (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/direct-certification-manual.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/direct-certification-manual.pdf</a>). Some of these students have consequently matched with DC benefit codes, which have been incorrectly carried through to the benefit issuance list. This has also resulted in these matched students being counted in each schools' free/reduced eligible counts on the AccuClaim report and thus are then reported on the claims for reimbursement.</p> <p>Additionally, the AccuClaim reports have very high "highest approved paid" counts. This appears to be the result of the students coded to entity 100 or 400 that do not actually attend classes in the district buildings being pulled through when the AccuClaim reports are run. As a result, the "highest approved" counts for free, reduced, and paid eligible on the AccuClaims are not accurate and neither is the enrollment number.</p> <p><b>Corrective Action:</b> Work with the appropriate school staff members and software support staff to ensure that only students enrolled in the SFA with access to meals are run through DC. The benefit issuance list must also be updated so these ineligible students are not included. Please also investigate if there is a way to pull accurate "highest approved paid" counts through to the AccuClaim. If this cannot be achieved, a manual edit check of paid meal counts must be conducted monthly to ensure that counts of paid meals served do not exceed the number of paid eligible and do not exceed the attendance adjusted eligible paid count. Ideally, the AccuClaim report should accurately reflect the number approved free, reduced-price, and paid eligible students as well as school enrollment by school building. Please submit a description of how this issue will be corrected.</p>
<b>Site Name</b>	Iola-Scandinavia El	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	409	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>01/21/2020 03:22 PM</p>	<p><b>Finding:</b> The current breakfast production records lack a column for quantity prepared (in purchase units) (e.g. #10 can, 2 cases, 1 loaf, etc.) and thus this information is not being recorded.</p> <p><b>Corrective Action:</b> Submit a week of updated, completed breakfast production records for Iola-Scandinavia Elementary School (occurring after this AR but before the CA due date) showing quantity prepared (in purchase units) is added and recorded.</p>
<b>Site Name</b>	Iola-Scandinavia Hi	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1409	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>01/21/2020 05:18 PM</p>	<p><b>Finding:</b> SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The following food storage violations were observed: milk crates full of half-pints of milk stored directly on cooler floor; boxes full of food stored directly on floor of freezer.</p> <p><b>Corrective Action:</b> Please submit a statement describing how these food items will be properly stored at least six inches off the ground.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/22/2020	1403	138	Administrative Review	ALL				

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Comments						
Eligible Students				Created By	Created Date	
As described in the corrective action section, the benefit issuance list contained the names of a number of students that are in the district's student information system for tracking purposes and were run through direct certification (DC), but are not students actively enrolled in the district and are not attending district schools. These students do not have access to meals, as they do not attend school in Iola-Scandinavia school buildings. Only students that are actively enrolled in the district schools who have access to meals should be run through DC. When running DC, SFAs may not include students that are open enrolled to other schools and cannot run DC on behalf of other schools, as described on page 15 of the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/direct-certification-manual.pdf">Direct Certification User Guide</a> ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/direct-certification-manual.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/direct-certification-manual.pdf</a> ).					1/22/2020 9:26:09 AM	
01/22/2020	1402	1106	Administrative Review	Iola-Scandinavia Hi	FSD	
Comments						
Fundraisers, Healthy Ideas				Created By	Created Date	
For ideas on healthy fundraisers that do not involve food, review the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/healthy-fundraising-ideas.pdf">Healthy Fundraising Ideas handout</a> ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/healthy-fundraising-ideas.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/healthy-fundraising-ideas.pdf</a> ).					1/22/2020 9:10:27 AM	
01/21/2020	1400	106	Administrative Review	ALL		
Comments						
Sharing of Information and Disclosure				Created By	Created Date	
Within the SFA, access to free/reduced meal information is limited, and no fee waivers are currently offered based on meal eligibility. The food service director has not been asked to share individual-level free/reduced eligibility information, and thus disclosure has not been a concern in the district to date--only aggregate data has been requested and shared.					1/21/2020 5:35:24 PM	
The information provided by the family on the free and reduced-price application is to be used only for determining eligibility for meal. Each school year, the SFA must seek written consent from the parent or guardian to use the information provided on the application or through DC for non-program purposes, such as fee waivers. Detailed consent must be obtained each school year. Find the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc">Sharing of Information with Other Programs</a> template on the Free and Reduced Meal Applications and Eligibility webpage ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc</a> ).						
For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the Disclosure Agreement form should be signed and kept on file at the district. Find the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement-school-staff.docx">Disclosure of Free and Reduced-Price Information</a> template on the Free and Reduced Meal Applications and Eligibility webpage ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement-school-staff.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement-school-staff.docx</a> ).						
01/21/2020	1397	805	Administrative Review	ALL		
Comments						
Special Dietary Needs Accommodations				Created By	Created Date	
The SFA is not currently making any accommodations for special dietary needs requests. However, if families inquire about such accommodations in the future, it is recommended that the food service director review the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs">Special Dietary Needs webpage</a> and contact the DPI School Nutrition Team for additional guidance, as needed ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs">https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs</a> ).					1/21/2020 5:22:44 PM	
A signed medical statement from a licensed medical practitioner (in WI anyone who can write a prescription) must support all food substitutions made outside of the meal pattern requirements. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website, which is also available in Spanish and Hmong.						
SFAs may at their discretion, choose to accommodate special dietary requests without a signed medical statement from a licensed medical practitioner. These accommodations must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is highly recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.						
01/21/2020	1395	1106	Administrative Review	Iola-Scandinavia Hi	FSD	

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Comments									
Fundraiser Tracking Tool					Created By			Created Date	
Iola-Scandinavia School District does a great job tracking and approving fundraisers held by student organizations. Although fundraisers are being tracked on a sheet, there is missing information crucial to knowing if a fundraiser is compliant or not. Make sure to include the exact times and locations the fundraisers occur. This ensures that non-compliant fundraisers are not occurring in the meal service area during meal service times and interfering with the breakfast and/or lunch program(s). Please also include the item(s) being sold. It was unclear if the fundraisers tracked were compliant or not as this information was missing.								1/21/2020 3:35:52 PM	
01/21/2020	1394	1106	Administrative Review	Iola-Scandinavia Hi	FSD				
Comments									
Fundraisers, General Information					Created By			Created Date	
Fundraisers (compliant or not compliant) only need to be recorded for those that occur on the school campus during the school day (midnight until 30 minutes after the last instructional bell) to students in which food items are sold. Fundraisers that occur during evenings or on weekends do not need to meet Smart Snacks standards as they are outside of the school day.								1/21/2020 3:30:13 PM	
01/21/2020	1393	409	Administrative Review	Iola-Scandinavia El	FSD				
Comments									
Production Records					Created By			Created Date	
Planned and actual number of servings prepared are required pieces of production records. Currently on breakfast production records, there is a column for planned number of servings, with the numbers sometimes crossed out and a new number (actual # of servings) written in. For cleaner documentation, consider adding to the header of the column: "planned/actual # of servings prepared." This way any time there is a change in the number, two numbers with a slash in between can be written.  Be specific on production records about identity, brand, and/or product number of menu items. Instead of Grilled Chicken, indicate that it is a patty list with a product number. This will help reduce confusion for staff preparing meals. Also, ensure the site is filled in daily on production records. Instead of Iola-Scandinavia School District, indicate Iola-Scandinavia High School, etc.								1/21/2020 3:14:07 PM	
01/21/2020	1392	409	Administrative Review	Iola-Scandinavia Hi	FSD				
Comments									
Variety Menu Item Recipe					Created By			Created Date	
Instead of Muffin Variety on production records, make sure to document by type. If this becomes too time- or labor-intensive, considering completing a variety recipe. Instructions and templates are available on the standardized recipes webpage under <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/standardized-recipes">Variety Item Recipe</a> (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/standardized-recipes).								1/21/2020 3:07:01 PM	
01/21/2020	1390	409	Administrative Review	Iola-Scandinavia Hi	FSD				
Comments									
Production Records, lunch					Created By			Created Date	
The lunch production record template currently in use lacks both planned number of servings and quantity prepared (in purchase units). The food service director is now recording both pieces of information in one column, which meets requirements. A copy of the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">Production Record Requirements</a> and templates may be found on our webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).								1/21/2020 3:01:02 PM	
01/21/2020	1389		Administrative Review	Iola-Scandinavia Hi	FSD				
Comments									
School Breakfast Program (SBP)					Created By			Created Date	
Consider participating in the School Breakfast Program (SBP) at Iola-Scandinavia High School. Participation in SBP will enable the SFA to help students start their school day with good nutrition and will provide reimbursement to the SFA.  There are a variety of breakfast models that schools may try depending on what works best for their staff, students, and food service operation. Traditional breakfast lines, Grab n' Go, breakfast carts, Breakfast in the Classroom (BIC), and breakfast after the bell are all breakfast models that can work well for serving reimbursable meals.								1/21/2020 2:52:56 PM	

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More information is available on the <a href="https://dpi.wi.gov/school-nutrition/school-breakfast-program">School Breakfast Program webpage</a> ( <a href="https://dpi.wi.gov/school-nutrition/school-breakfast-program">https://dpi.wi.gov/school-nutrition/school-breakfast-program</a> ).							
01/14/2020	1308	806	Administrative Review	ALL			
Comments							
Civil Rights Training				Created By	Created Date		
To ensure the most updated civil rights training is administered to food service staff annually, it is recommended to download a new copy of the DPI School Nutrition Team (SNT) Civil Rights Training PowerPoint from the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#crtraining">Civil Rights webpage</a> each year ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#crtraining">https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#crtraining</a> ). The SNT updates training materials when necessary, so downloading a new presentation each year will ensure the most recent information is presented.					1/14/2020 9:40:21 AM		
01/14/2020	1307	803	Administrative Review	ALL			
Comments							
Complaints of Discrimination				Created By	Created Date		
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 <a href="https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#complaints">Civil Rights webpage</a> and work towards adopting procedures that comply with the requirements ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#complaints">https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#complaints</a> ).					1/14/2020 9:32:47 AM		
01/14/2020	1305	1000	Administrative Review	ALL			
Comments							
Local Wellness Policy Resources				Created By	Created Date		
As the district continues developing the wellness policy and local wellness initiatives, it is recommended to review the resources on the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">Local Wellness Policy webpage</a> ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy</a> ). Of particular interest may be: <ul style="list-style-type: none"> <li>The Local Wellness Policy Builder which contains sample language that can be used when updating a policy</li> <li>The Local Wellness Policy Checklist which provides a summary of required content areas that must be included in the policy</li> </ul>					1/14/2020 9:17:34 AM		
01/14/2020	1304	1005	Administrative Review	ALL			
Comments							
Local Wellness Policy Triennial Assessment				Created By	Created Date		
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.					1/14/2020 9:13:10 AM		
The <a href="http://www.wellsat.org/default.aspx">Wellness School Assessment Tool (WellSAT)</a> allows SFAs to evaluate how their policy compares to a model policy ( <a href="http://www.wellsat.org/default.aspx">http://www.wellsat.org/default.aspx</a> ). 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).							
The <a href="https://docs.google.com/a/dpi.wi.gov/forms/d/1u6LUEy3Vd_sTU-s8fq0EYc-UscxZK-edIFq28WtqSIU/edit?usp=drive_web">Local Wellness Policy Report Card</a> 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 ( <a href="https://docs.google.com/a/dpi.wi.gov/forms/d/1u6LUEy3Vd_sTU-s8fq0EYc-UscxZK-edIFq28WtqSIU/edit?usp=drive_web">https://docs.google.com/a/dpi.wi.gov/forms/d/1u6LUEy3Vd_sTU-s8fq0EYc-UscxZK-edIFq28WtqSIU/edit?usp=drive_web</a> ). 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. If fully completed, the report card meets all requirements of the triennial assessment. Please visit the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">Local Wellness Policy webpage</a> for more information ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy</a> ).							
01/10/2020	1284	1601	Administrative Review	ALL			

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Comments				
Summer Food Service Program (SFSP) Promotion				
Created By				
Created Date				
USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods: <ul style="list-style-type: none"> <li>• Promotion of the <a href="http://www.fns.usda.gov/capacitybuilder">USDA's Capacity Builder Map</a> on the <a href="https://dpi.wi.gov/community-nutrition/sfsp">DPI Summer Meals webpage</a> (<a href="http://www.fns.usda.gov/capacitybuilder">http://www.fns.usda.gov/capacitybuilder</a>; <a href="https://dpi.wi.gov/community-nutrition/sfsp">https://dpi.wi.gov/community-nutrition/sfsp</a>)</li> <li>• Promotion of calling 211 to locate meals in the area</li> <li>• Promotion of the ability to text 'food' to 877-877 to locate meals in the area</li> <li>• Promotion of the <a href="https://www.fns.usda.gov/sfsp/household">USDA Summer Food Service Program webpage</a> (<a href="https://www.fns.usda.gov/sfsp/household">https://www.fns.usda.gov/sfsp/household</a>)</li> </ul>				
01/10/2020	1276	709	Administrative Review	ALL
Comments				
Non-Program Food Revenue Tool				
Created By				
Created Date				
The SFA submitted a DPI non-program food revenue tool completed in December 2018. The tool showed compliance with revenue requirements, however there are a few items to note when completing the tool in the future: adult meals must be included in the non-program food section; catering items do not need to be included unless they are sold on a regular basis; paid lunch prices should reflect a weighted average (not a simple average).				
1/10/2020 10:33:39 AM				