

# Administrative Review Report

Marshfield School District

Review Schedule: offsite with March 2020 as the review month

Due to the unprecedented COVID-19 related school closures beginning in March 2020, the State Agency (SA) was not able to perform the on-site portion of this Administrative Review (AR). The SA has, to the maximum extent feasible, continued to assist School Food Authorities (SFAs) with items that would normally be addressed in the on-site portion to ensure all SFAs are given the most thorough guidance and technical assistance possible. The SA appreciates the SFA's flexibility and willingness to complete the offsite review during this challenging time.

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews (AR) are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

## **Appreciation/Commendations:**

Thank you to the co-Food Service Directors and financial staff at Marshfield School District for the ability to conduct the Administrative Review off-site and for being available to answer questions and provide 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.

The school nutrition webpage is very professional and informative. Besides menus and nutritional information, it includes pictures of the directors, farm to school initiatives and featured recipes. The website also contains the typical application materials, but also includes an "I Speak" form to assist families with a language other than English. In the section addressing wellness, there is a request for parents to join the local wellness committee or attend meetings.

In the SFA, the determining official has a fantastic understanding of approving applications and/or to check the electronic calculations. Applications with differing income frequencies were determined correctly. The verification process was correctly completed for 2 household applications, even with some difficult income sources.

Meal counting and claiming are completed correctly and verified before submitting the claim.

The meal components and quantities section of the review was very impressive. It is clear that the FSD and staff have a great understand of the NSLP and NSBP as well as requirements for Smart Snacks. The menus were well done and production records thoroughly completed. Thank you for taking the time to do a great job with these tasks and for feeding your students healthy and delicious meals.

The DPI review team is confident that Marshfield School District will continue to improve their knowledge and operation of child nutrition programs.

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## **Recommendations:**

The co-FSDs must work with the electronic software provider to better understand the reports and functions to pull reports and deactivate students once graduated.

## **Training Opportunities**

The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state, though this year they will be conducted virtually. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage ([dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training)).

SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).

Refer to the Technical Assistance and Compliance Reminders resource sent in an email and uploaded to the SNACS Documents tab.

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## Findings and Corrective Action:

Due date: July 27, 2020

Form Name	Certification and Benefit Issuance (100 - 121)
Question #	110
Corrective Action #1	<p><b>Finding:</b> The SFA's direct certification notification letter generated from the electronic software does not include the full non-discrimination statement. <b>Corrective Action:</b> Provide a statement that the SNT template letter will be used, or upload a corrected letter template for direct certification notification to the household into SNACS.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	705
Corrective Action #2	<p><b>Finding:</b> SFA does not have adequate internal controls to maintain oversight of federal funds. The nonprofit school food service account was charged for unallowable expenses (2 CFR 200.303, 2 CFR 200.400): Charging food service fund 50 for a monthly percentage of the entire phone charge invoice to the district is an unallowable practice and must be made into a specific calculation. <b>Corrective Action:</b> The cost of the phone charge must be reviewed from school year 2018-29 through the end of school year 2019-20 to determine the exact monthly charge to the food service account, by doing a "time study" for actual expenses. If necessary, make a transfer to food service fund 50, using non-Federal sources and upload a copy of the general ledger into SNACS. Another option is to discontinue charging this phone charge to the food service account. Develop an internal control by training appropriate staff on allowable expenses and upload that statement into SNACS and include the decision for the phone charge.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	126
Corrective Action #3	<p>Four hundred fifty free and reduced price meal application determinations were reviewed with six errors identified.</p> <p><b>Finding:</b> The SFA did not process all household applications and direct certification updates in</p>

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	<p>compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which eligibility statuses need to be corrected. <b>Corrective Action:</b> Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	133
<b>Corrective Action #4</b>	<p><b>Finding:</b> Free eligibility from E code in Direct Certification was extended to others in the household; foster status does not extend to other members due to being Other Source Categorically free. <b>Corrective Action:</b> Review parameters in Skyward to correct this error and submit a statement how that will be correct for the 2020-21 school year.</p>
<b>Form Name</b>	Civil Rights (809 - 810)
<b>Question #</b>	810
<b>Corrective Action #5</b>	<p><b>Finding:</b> The correct non-discrimination statement was not included on all program materials, to include board policies related to child nutrition and the school nutrition webpage. <b>Corrective Action:</b> Submit a statement how the program materials will be updated to include the correct non-discrimination statement and upload the statement into SNACS.</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)
<b>Question #</b>	410
<b>Corrective Action #6</b>	<p><b>Finding:</b> There was a weekly grain shortage at lunch during the week of review. Only 7.5 oz eq grain was offered over the course of the week, which does not meet the minimum 8.0 oz. eq. grain requirement for the K-5 meal pattern. <b>Corrective Action:</b> Submit a statement explaining how this weekly grain shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels,</p>

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	ingredients lists, and/or crediting documentation.

## Technical Assistance from the Nutrition Program Consultant

### Meal eligibility

- Several students were on the benefit issuance list with one eligibility code, but actually were correctly receiving a different code at the point of service (POS). The software vendor needs to provide annual updates for the LEA to initiate. The LEA must learn the software report pathways to accurately list student eligibility, especially when the 30 day carry over expires and students without new eligibility determinations revert to paid.
- If clarifying information is received from the household when determining an application, the LEA should initial and date those entries.
- A foster eligibility does not extend to others in the household, whether the student is found eligible through direct certification, on an application with the box checked or with documentation from a child placement agency. A foster child may be listed as a household member when determining an application for the rest of the household.
- If a family has overtime on their income proof statement, you do not need to count it if that is not typical payment.

### Onsite Monitoring

- The annual On-site Monitoring requirement is to be performed for all NSLP sites and 50% of the School Breakfast Program (SBP) sites each year. Each SBP site must be reviewed once every two years.

### Local Wellness Policy

- As of June 30, 2020, SFAs must complete their first triennial assessment. The assessment must be completed, at minimum, once every three year; this district's LWP was reviewed in January 2018, but may need to complete a full triennial assessment. 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. NOTE: Due to COVID-19 and school dismissing early, USDA has allowed a one year extension for the triennial assessment due date of June 30, 2021 by completing a waiver with DPI.

### Professional Standards

- This SFA operates with 2 co-food service directors. They provide and obtain trainings, but hadn't completed the hours for the school year 2019-20 before the COVID-19 disruption. Keep in mind that co-FSDs need 12 hours of training each school year. So many topics were covered in the discussions during the Administrative Review; you may count time spent on learning new topics.

## Technical Assistance from the Public Health Nutritionist

### Meal Pattern / Recipe

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- In your taco recipe, the meat was listed in volume rather than in weight. As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a “4 oz spoodle” for example, which makes this somewhat confusing. A 4 oz or ½ cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas).

## Production Records

- Production records are intended to be useful tools to record production information. The milk production record template currently in use lacks required information: Site. A copy of the Production Record Requirements and templates may be found on our webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records>)
- When additional items were added to your production records, such as broccoli on Thursday, there was no planned portion sizes listed. Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Please refer to the Production Record Requirements for a list of all mandatory items that must be listed and filled in on production records (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>)

## Buy American

- Food products used for the school meals program must have documentation if they are non-domestic. 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>). Please complete non-domestic documentation for any products at all locations in the district (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).