

Administrative Review Report

756775 WI Sch for Blind and Visually Impaired

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/31/2019	11/18/2019
On-Site Review	12/02/2019	12/03/2019
Site Selection Worksheet	10/31/2019	10/31/2019
Entrance Conference	12/02/2019	12/02/2019
Exit Conference	12/03/2019	12/03/2019
Corrective Action Deadline	01/02/2020	

Commendations:

- Applications are determined in a timely fashion, well within the required 10 operating days from receipt.
- Thank you for utilizing the P2 modified application and letter notification templates.
- The recent Local Wellness Policy updates look great. The policy meets all minimum required content areas. To complete the triennial assessment, which is due in June of 2020, utilize the Report Card in combination with the WellSAT. The Report card will help you assess how you are meeting your goal and objectives while the WellSAT will compare your policy to a model policy. Both resources are found on the DPI SNT LWP webpage: <https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy>
- Meal prep, service, and storage areas are clean and tidy.

Recommendations:

- The Wisconsin School for the Blind and Visually Impaired is encouraged to initiate communication with a transferring students new LEA stating that the child came from a Special Provision Option (Provision 2) school. If the student will be enrolling in an outside LEA that also participates in the NSLP and/or SBP, the child is automatically eligible for free meals for 30 operating days (or until a new eligibility determination is made). The new LEA may claim the meals at the free rate during this transition period. DPI SNT has an optional template that can be modified and included with other important transfer records. The receiving school should simply contact the DPI SNT to confirm the former school was an approved SPO school in WI.
- Direct Certification full enrollment runs are completed as required. Consider running direct certification more often during the base year to pick up additional matches and maximize future non-base year claiming percentages.
- When incomes are reported by the household in more than one frequency (e.g., monthly, weekly, monthly), covert all the income to annual. If multiple income sources are reported in the same frequency, determine the application in the one reported frequency. Do not covert to monthly or annual.
- Visiting Students:
 - Non-Base Year. (student(s) from non-provision school attend WSBVI): The school would not take payment from the visiting students and meals served to the visiting students would be included as part of the total count of meals served.
 - Base Year (student(s) from a non-provision school attend WSBVI): Visiting students can be claimed in the paid category or in a higher individual meal eligibility category if documentation is provided by the visiting student's home school. The food service account can be used to cover the value of any reduced or paid meals of visiting students.
- During meal observation, it was noted that students have no limit on the number of menu items they can select as part of their reimbursable meal. Due to the lack of restriction, the intended maximums for certain food groups and inevitably the dietary specifications were exceeded. Instead of completing a nutrient analysis, it is recommended the SFA charge the extra food items selected by students as a la carte. This would qualify these items as smart snacks and they would need to fulfill certain general and nutrient standards. Menu items such as entrees sold the same day, low-fat cheese, low-fat milk, and canned fruits are all exempt and allowable to be sold to students a la carte during the meal service. It is critical that a system is in place to document when items outside the intended reimbursable meal are selected. This will require an updated POS system and subsequent training. It is DPI's hope that this will be the least disruptive option for the student, while ensuring that they are provided a nutrient-dense meal.
- Consider purchasing a electronic point of service software to assist with the monthly claim consolidation process. Electronic systems reduce the potential for claim consolidation errors and have a built in edit check report. In addition, a point of service system can assist with tracking a la carte sales and notify staff of a meal accommodations or medical statements that are on file. The WSBVI has many meal accommodations to manage. With turnover of staff and a manual system, it may be difficult for staff to identify which meals can be claimed for reimbursement (with a statement signed by a licensed medical practitioner) despite the student's tray not containing the required meal components. Electronic point of service systems are all different, but options may include: 4-digit PIN number entry, a finger print scan, or a bar code scan.

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Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Completed.	
Corrective Action History	<p>Flagged 11/25/2019 02:31 PM</p>	<p>Finding: The Annual Financial Report has not been submitted to document all revenues and expenses by program and expense category (7 CFR 210.19). The report was due August 31, 2019. CA: Review the Annual Financial Report webcast or manual on the DPI website then submit the 2018-19 Annual Financial Report with revenues and expenses broken out by program and category. Upload the report into SNACS. Corrected onsite. No further action required.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/04/2019 12:30 PM</p>	<p>Finding: SFA did not complete the Nonprogram Foods Revenue Tool used to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14. CA: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed. Note: Since the AFR from the 1819 SY was completed on 12/3 of the onsite visit, reviewer was able to calculate the NP Food Revenue ratio, which showed the agency is in compliance. TA was provided for the SFA to first complete the AFR and then the NP food Revenue ratio calculation. If the calculation shows non-compliance, the agency will need to raise food item prices/amount charged to the GPR line for a la carte and other NP food sales.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	710	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/04/2019 02:45 PM</p>	<p>Finding: The SFA is not tracking a la carte items when they are taken in addition to the reimbursable meal. The current system ("X") is only tracking and charging a unit price for non-reimbursable meals. When a student takes the reimbursable meal + additional milk, juice, string cheese, etc. These additional items are not accounted for. These items must be tracked and separated from the reimbursable meal to show financial and nutritional compliance. CA: Provide a plan on how all a la carte food items will be tracked at the point of service. The cost/charge of the items that will be paid by outside funds must be charged by item, rather than bundled due to Smart Snacks. Review team and SFA discussed adding a notes column for staff to document any extra items taken in addition to the unit reimbursable meal.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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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).</p> <p>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>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Completed.	
Corrective Action History	<p>Flagged</p> <p>12/04/2019 01:25 PM</p>	<p>Finding: Incorrect reduced meal eligibility determination. The application is incomplete. Total household members listed in box G. are 5, while only 3 household names are listed on the application. The agency will need to follow-up and obtain clarification of household members and income.</p> <p>CA: Since this application was also selected for Verification and resulted in a nonresponse, send a letter of adverse action. Provide 10 calendar days to appeal prior to changing the meal benefit to paid.</p> <p>Corrected onsite. No further action required. Do not adjust past claims. This error will be corrected with the base year adjustment for Sept, Oct, Nov, and part of Dec</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	207	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>12/04/2019 01:36 PM</p>	<p>Finding: SFA did not correctly complete section 2 and 3-1 of the Verification Collection Report (VCR) in the 1819 SY. This report can no longer be amended.</p> <p>CA: Submit a statement agreeing to review the VCR step-by-step instructions, which are communicated annually via email memos, webcasts, summer trainings, and are posted on the SNT webpage.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>12/04/2019 01:30 PM</p>	<p>Finding: SFA did not complete a confirmation review before verifying application(s).</p> <p>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>
Site Name		
Form Name	Verification (207 - 215)	
Question #	212	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 12/04/2019 01:30 PM	Finding: The SFA did not meet the follow-up requirements when a household failed to respond to the request for verification (7 CFR 245.6a). CA: Submit a statement of understanding that the SFA's verifying official must follow up with the household at least once before the verification process is complete.
Site Name		
Form Name	Verification (207 - 215)	
Question #	213	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/04/2019 01:32 PM	Finding: The SFA's did not send a "We have Checked" letter of adverse action. CA: Review the Notice of Adverse Action section of the Eligibility Manual on pg 57. Submit a statement that the P2 DPI template letter will be used to communicate the outcome of verification moving forward.
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	Flagged 12/04/2019 11:35 AM	Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. CA: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool. Also include planned training hours to meet the minimum annual hours for each staff listed on the document. Upload the completed tracking tool into SNACS.
Site Name		
Form Name	Reporting and Recordkeeping (1500 - 1501)	
Question #	1500	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/03/2019 11:07 AM	Finding: Required USDA reports are not submitted on time. The Annual School Food Service Report (AFR) was due August 31. The Paid Lunch Price Report (PLP) and FNS-10 Report were both due on November 15th. All three reports were submitted prior to or during the onsite visit. CA: Submit a statement through SNACS agreeing to submit required CNP reports by the deadline as outlined in the Provision 2 Calendar of Requirements.
Site Name		
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	324	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/04/2019 02:30 PM	Finding: Non-systemic clerical claim consolidation error in the month of September for NSLP and SBP. The agency claimed 4 operating days from October on September's claim. There was also a minor underclaim NSLP and SBP consolidation error in October.

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		CA: Continue to work with the consultant to process the base year adjustment calculation. The above errors will be corrected within this one adjustment, which may result in a reclaim. No further action required.
Site Name		
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	325	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/04/2019 02:22 PM	<p>Finding: SFA did not complete the monthly edit check process to ensure accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8.</p> <p>CA: Upload November's monthly edit check for breakfast and lunch along with the point of service tally sheets into SNACS.</p>
Site Name		
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	401	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/03/2019 01:14 PM	<p>Finding: Three sack lunches were prepared for students that were missing the milk component.</p> <p>Corrective Action: Sack lunches need to be included on the production records and a recipe needs to be made available for food service staff. Along with updating the Sack Lunch recipe and including it on the production records, please submit a statement explaining how the lunch items will be kept cold.</p>
Site Name		
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/03/2019 12:30 PM	<p>Finding: Signage was not posted at lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination.</p> <p>Corrective Action: Submit a picture of completed signage posted near the lunch and breakfast service line.</p>
Site Name		
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/03/2019 08:18 AM	<p>Finding: There were no legumes offered during the week of review. It is required to offer at least ½ cup of the beans/peas/legumes vegetable subgroup per week.</p> <p>Corrective Action: Please submit a lunch menu planning worksheet and one week's worth of completed production records to show that this vegetable subgroup requirement is being met.</p>

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Site Name		
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/03/2019 12:39 PM</p>	<p>Finding: The weekly minimum requirement for grain was not met for 9-12 during the review period. The following represents the planned portion sizes: - Monday: 1.5 oz eq from egg noodles or chicken tender breading + dessert -Thursday: 1.5 oz eq from garlic bread with meatloaf + dessert -Friday: Roll served with baked fish was 1.0 oz eq + assorted desserts The weekly minimum grain requirement for 9-12 is 10 oz eq and this menu provided a weekly minimum of 9.0 oz eq.</p> <p>Corrective Action: Describe specifically how the weekly minimum requirement for grain would be met for lunch for this week in the cycle menu.</p>
Site Name		
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/03/2019 10:55 AM</p>	<p>Finding: The oz eq of grain-based desserts offered per week (2.5 oz eq) exceeds the allowable 2 oz eq per week.</p> <p>Corrective Action: Submit one week of production records demonstrating that the portion size and/or frequency of offering grain-based desserts has been decreased and meets meal pattern requirements.</p>
Site Name		
Form Name	Offer vs Serve (500-502)	
Question #	501	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/03/2019 12:47 PM</p>	<p>Finding: Food service staff were unclear about the Offer versus Serve (OVS) requirements for lunch/breakfast. Although all students claimed took a reimbursable meal, it is important for staff to understand the OVS requirements. OVS resources on WI DPI's Menu Planning webpage may be used as training resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).</p> <p>CorrectiveAction: Have staff responsible for determining reimbursable meals obtain training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Site Name		
Form Name	Smart Snacks (1104 - 1107)	
Question #	1104	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/03/2019 01:02 PM</p>	<p>Finding: Students are currently able to take second helpings of items outside of the reimbursable meal. When menu items are provided and sold outside the reimbursable meal, they must meet Smart Snacks standards.</p>

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		Corrective Action: For the benefit of the food service staff, all items available in the a la carte setting should be pre-determined and approved by the Food Service Director as meeting Smart Snacks nutrient guidelines. Please submit a plan and list of all products that students will be allowed to take seconds of.
Site Name		
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/04/2019 11:36 AM	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. Corrected onsite, no further action required.</p>
Site Name		
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1407	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/04/2019 12:09 PM	<p>Finding: Production records incorrectly categorize menu item(s) by process. For example, on 10/15, riblet is listed as a process 1 (no cook). Riblet is either 2 or 3. SFAs must have a food safety plan that categorizes menu items by process 1, 2, or 3. This control measure is used if there is a food borne illness as well as for staff to apply specific SOPs to daily prep and service.</p> <p>CA: If the SFA is going to continue documenting process 1, 2, or 3 on the production records, ensure staff are trained using pages 8-10 of the fs plan and menu items are correctly re-categorized. Alternatively, categorize the cycle menu within the fs plan using the chart on pg. 4. Submit a copy of the updated chart, or provide 1 week of production records showing menu items are correctly re-categorized.</p>
Site Name		
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/03/2019 11:04 AM	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Canned apples (Italy) Fruit cocktail (China) Olives (Morocco)</p> <p>Corrective Action: Complete and submit Non-Compliant Product Forms for the products listed above (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
12/04/2019	1095		Administrative Review		WSBVI			
Comments								
						Created By	Created Date	
USDA requires all SFAs 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: •Promotion of the summer meals locator on the DPI Summer Meals webpage •Promotion of calling 211 to locate meals in the area							12/4/2019 12:19:59 PM	

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•Promotion of the ability to text 'food' to 877-877 to locate meals in the area •Promotion of the USDA Summer Food website (http://www.fns.usda.gov/summerfoodrocks) 7 CFR 210.12(d)							
12/03/2019	1077	410	Administrative Review	WI Sch f/t Blind&Vis Impaired	FSD		
Comments							
						Created By	Created Date
The weekly amounts of grain and meat/meat alternate (M/MA) offered at breakfast (36.5 oz eq) greatly exceeded the recommended maximum of 10 ounce equivalents per week. Serving this much grain and M/MA means that the dietary specifications are very likely exceeded for breakfast. It also results in a high food cost. It is a best practice to offer choices within each component as opposed to offering an unrestricted number of menu items.							12/3/2019 8:30:59 AM
11/25/2019	1049	1005	Administrative Review	ALL			
Comments							
						Created By	Created Date
The LWP must be assessed triennially. The first assessment is due June 30, 2020. The assessment should include how the agency is meeting their goals and objectives along with how the local policy compares to a USDA model policy. The WellSAT and Report card can be used to complete both parts of the assessment and are available on the SNT LWP website. When complete, share the results of the assessment with the public.							11/25/2019 2:39:53 PM