

Administrative Review Report

Brillion School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	05/21/2020	07/07/2020
Exit Conference	07/09/2020	07/09/2020

Commendations:

From the Nutrition Program Consultant:

Thank you to the staff at Brillion School District for your efforts, patience, and flexibility during this off-site review. We also want to express our gratitude to those who did a great job with the service, counting, and claiming of meals during school closures. The food service staff at Brillion School District have worked diligently to provide meals to their students. Staff are dedicated to the well-being of their students and we sincerely thank you all for your hard work. Thank you to the Food Service Director for being receptive to technical assistance throughout this review and for the fantastic work him and his team have done and continue to do with the meal programs.

From the Public Health Nutritionist:

Thank you for your flexibility during this off-site review. Documentation was well organized. There were no meal pattern findings from the week of review- excellent! Production records and recipes are thoroughly completed. Keep up the great work! Please be in touch with any questions.

Recommendations:

Every summer, the School Nutrition Team hosts trainings (SNSDC) around the state. Due to COVID-19, these trainings will be conducted virtually. There is no charge, registration, or course sign-up required for these trainings. Each course has a video recording. Recorded trainings, resources, and links to join live office hours will be available July 6. Please see the SNSDC webpage to learn more (<https://dpi.wi.gov/school-nutrition/training/snsdc>).

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Findings and Corrective Action:

Form Name	Revenue From Non-Program Foods (709 - 711)
Corrective Action History	<p>Finding: SFA did not complete the DPI Non-program Foods Revenue Tool or USDA Tool to determine compliance with non-program foods pricing and ratio requirements. Reference these tools on the SNT Financial Management webpage (https://dpi.wi.gov/school-nutrition/program-requirements/financial-management).</p> <p>Corrective Action: Provide a statement of understanding that this tool is required to be completed annually using a 5 day reference period from the current school year and used to set non-program food pricing. Include the position responsible for ensuring this is completed.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Corrective Action History	<p>Finding: There was an error for one free/reduced household income application. The total annual household income was incorrectly calculated. This resulted in the student receiving reduced-price meals starting 10/7/2019, but the student actually did not qualify for meal benefits. The fiscal action threshold was not met. The error details have been uploaded into SNACS.</p> <p>Corrective Action: Please correct the error for this application, notify the household of the error (via a notification letter), and change the benefit status within the Benefit Issuance list and the Skyward system. The household must be given 10 calendar days prior to the benefit status changing. Upload the notification letter into SNACS.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)
Corrective Action History	<p>Finding: Signage was not posted at breakfast or 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. Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p>Corrective Action: Submit a picture of completed signage posted near the lunch and breakfast service line.</p>
Form Name	Smart Snacks (1104 - 1107)
Corrective Action History	<p>Finding: The Uncrustable cannot be sold a la carte, because the calories from fat exceeds the limit of 35%. See Smart Snacks in a Nutshell for further requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf).</p> <p>Corrective Action: State what will be done with this product to comply with the Smart Snack regulations.</p>

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Form Name	Smart Snacks (1104 - 1107)
Corrective Action History	<p>Finding: Juicy Juice is 10 fl oz of 100% juice. This must be limited to 8 fl oz for students at the elementary level. The same is true for the Naked juice.</p> <p>Corrective Action: State what will be done with these products to comply with the Smart Snack regulations.</p>
Form Name	Special Milk Program
Corrective Action History	<p>Finding: Currently, SMP counts are taken by teachers as students receive the milk. The count sheets indicate to teachers which students qualify for free benefits. It is not necessary for teachers to have access to this information. Student benefit information must remain confidential.</p> <p>Corrective Action: Please submit a statement that explains how these check-off sheets will be altered.</p>

Technical Assistance

Verification:

- The application was initially determined correctly and the Verification process was done well. The pay stubs are reported weekly, but the application was reporting the sum of those pay stubs as monthly. Please ensure when verifying the household income, that the frequencies are also correctly reported.
- The Standard Sampling Method is only required the Verification non-response rate was 20% or greater in the preceding school year.

Counting and Claiming:

- It is important to match the meal prices on the contract to the prices charged to students on the service line. This is to ensure an adequate amount of revenue is produced to support the meal programs.
- As a reminder, all meals and milks are to be checked off as students come through the line; not before or after.

Civil Rights:

- As a reminder, all documents available to the public (e.g. local wellness policy, menus, household notification letters, etc.) are to contain the non-discrimination statement. If space does not allow for the long version, the short version may be used. See the [Civil Rights webpage](https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights) for more details (https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights).
- For the Civil Rights training, the CACFP outdated Power Point presentation was viewed. Please use SNT updated Power Point presentation or webcast going forward. These are located on the [SNT Civil Rights webpage](https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights) (https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights).

On-site Monitoring:

- The On-site Monitoring Forms are to be completed for all lunch sites and 50% of breakfast sites annually. This form must be completed by February 1.

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Allowable Expenses:

- During school closures due to COVID-19, mileage and meal delivery costs associated solely with the meal programs are allowable expenses to Fund 50.

Excess Cash Balance:

- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance." While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.

Outreach:

- All household SFAs must inform families of the availability of reimbursable breakfasts served under the [School Breakfast Program \(SBP\)](#) at the beginning and throughout the school year (<https://dpi.wi.gov/school-nutrition/programs/school-breakfast>). The goal of providing school breakfast outreach is to increase participation in the SBP.
- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. The 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:
 - Promotion of the [summer meals locator](#) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the [Summer Food Service Program](#) webpage (<https://dpi.wi.gov/community-nutrition/sfsp>)
 - For more information on the SFSP contact: Amy J. Kolano, RD, CD, SFSP Coordinator by phone at (608) 266-7124 or by email at amy.kolano@dpi.wi.gov.

Fundraisers:

- Documentation is required for school fundraisers. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks webpage](#), under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented.

Smart Snacks:

- We recommend using the [Alliance for a Healthier Generation Smart Snacks Product Calculator](#) to assess product compliance (<https://foodplanner.healthiergeneration.org/calculator/>). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.
- Use the [Smart Snacks in a Nutshell](#) to review the guidelines (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.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

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the school and the off-site kitchen (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Product Information:

- Be specific on production records about the identity, brand, portion size, and description of items served. Instead of “juice box variety”, list all flavors separately to clearly indicate what was served. Alternately, complete a [Variety Item Recipe](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/variety-item-recipe.xlsx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/variety-item-recipe.xlsx>).
- The dinner roll used is 1 ounce equivalent grain, not 1.25 oz. eq.