

# Administrative Review Report

Hilbert School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/07/2019	06/23/2020
On-Site Review	n/a	n/a
Site Selection Worksheet	11/07/2019	11/10/2019
Entrance Conference	06/01/2020	06/01/2020
Exit Conference	10/16/2020	10/16/2020

## Commendations:

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. The business manager and food service director were flexible and worked very hard to submit all necessary documentation electronically in a timely fashion.

Of the 118 student eligibility statuses reviewed, there were not any benefit issuance errors identified. The determining official does an excellent job managing student benefits! Additionally, verification was completed correctly and within the required timeframes. Great job!

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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>	705	
<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 07/07/2020 02:20 PM</p>	<p><b>Finding:</b> The SFA charges one hour per day of custodial labor to food service to account for the time it takes to clean the food service area and deliver meals to St. Mary's School. A time study was conducted by the business manager several years ago to establish this expense as a direct cost to food service. However, this time study has not been completed annually as required.</p> <p><b>Corrective Action:</b> Submit a plan that describes how and when the necessary time study will be completed for the 2020-21 school year. Please ensure this time study supporting custodial charges is completed annually and that the documentation is retained in accordance with the records retention requirements.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 07/07/2020 01:43 PM</p>	<p><b>Finding:</b> The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p><b>Corrective Action:</b> Provide a timeline for when a school meal program complaint policy 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. Please reference the Complaints of Discrimination section of the <a href="#">Civil Rights webpage</a> for more information and a template policy (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights">https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights</a>).</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	806	
<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 07/07/2020 01:46 PM</p>	<p><b>Finding:</b> The civil rights presentation used for training was not the most current presentation.</p> <p><b>Corrective Action:</b> Submit a plan describing how the correct presentation will be used going forward for the required annual civil rights training. It is recommended to download the presentation from the <a href="#">Civil Rights webpage</a> every year or use the published <a href="#">Civil Rights Training webcast</a> each year to ensure the information in the training is the most current (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights">https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights</a>; <a href="https://dpi.wi.gov/school-nutrition/training/webcasts#civil%20rights">https://dpi.wi.gov/school-nutrition/training/webcasts#civil%20rights</a>).</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	

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<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 07/07/2020 12:53 PM</p>	<p><b>Finding:</b> The current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). Specific content language regarding foods provided but not sold at school and foods/beverage marketing is lacking.</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. Please review the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf">LWP checklist</a> and <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-online-builder-full-text.pdf">LWP builder</a> for assistance in developing this necessary policy content (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-online-builder-full-text.pdf).</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 07/07/2020 01:49 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 upcoming summers. Please include the method of communication and time frame for distributing SFSP outreach materials. See the corresponding technical assistance information for more details.</p>
<b>Site Name</b>	Hilbert Hi	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>		
<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 08/20/2020 12:41 PM</p>	<p><b>Finding:</b> Crediting documentation was unacceptable for the Polish sausage as it did not match descriptions found in the Food Buying Guide. Use the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/tipsheet_processedproduct.pdf">Tips for Accepting Processed Product Documentation</a> for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/tipsheet_processedproduct.pdf). <a href="https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry">PFS templates</a> can be found at the bottom of the USDA CN Labeling webpage (https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry).</p> <p><b>Corrective Action:</b> Submit a correct PFS from the manufacturer for the Polish sausage. If unable to obtain proper crediting documentation, please indicate what would be served in place of the Polish sausage, and provide any necessary crediting documentation.</p>
<b>Site Name</b>	Hilbert Hi	
<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 08/20/2020 12:15 PM</p>	<p><b>Finding:</b> Production records are intended to be useful tools to record production information. The production record template currently in use lacks required information and the records for the week of review were incompletely filled out. Missing or incomplete information includes:</p> <ul style="list-style-type: none"> <li>• Serving site</li> <li>• Meal service date (inconsistently completed)</li> </ul>

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		<ul style="list-style-type: none"> <li>• Menu item with recipe name/reference number or product name/description</li> <li>• Planned/actual number of servings prepared</li> <li>• Planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb. case, 2-96 count case)</li> <li>• Amount leftover (this can be in number of servings or purchase units) • Milk types available and actual usage by type, or total milk usage if milk recipe is used</li> <li>• Planned serving size and usage for condiments and any extra menu items</li> <li>• Alternate entrée option (sandwich)</li> </ul> <p>Additionally, it may be helpful to record both entrees offered as well as the alternate sandwich on the same production record and/or use a multiple grade group template to cut down on the number of sheets used daily. A copy of the <a href="#">Production Record Requirements</a> as well as a variety of templates can be found on our <a href="#">production records webpage</a> (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records</a>).</p> <p><b>Corrective action:</b> Submit one full week of completed production records that meet all requirements. Choose a week (Monday-Friday) that occurs after the completion of the Administrative Review (AR), but before the corrective action due date. It is also recommended that the <a href="#">Virtual SNSDC Production Records Course</a> and/or <a href="#">Production Records webcast</a> be viewed (<a href="https://dpi.wi.gov/school-nutrition/training/snsdc">https://dpi.wi.gov/school-nutrition/training/snsdc</a>, <a href="https://dpi.wi.gov/school-nutrition/training/webcasts#production%20records%20/%20standardized%20recipes">https://dpi.wi.gov/school-nutrition/training/webcasts#production%20records%20/%20standardized%20recipes</a>).</p>
<b>Site Name</b>	Hilbert Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	410	
<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>08/20/2020 11:08 AM</p>	<p><b>Finding:</b> Daily grain shortage at Hilbert High School on Thursday (2/6/2020) of the week of review. The <math>\frac{3}{4}</math>c serving of rice offered with the sweet and sour meatball entree only credits as 1.5 oz eq grain per serving and no other grain was offered with this meal. This is short of the required daily minimum of 2 oz eq grain for grades 9-12.</p> <p><b>Corrective Action:</b> Submit a statement explaining how this daily grain shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.</p> <p><i>Please note that repeat violations involving daily quantity shortages on future Administrative Reviews may result in fiscal action.</i></p>
<b>Site Name</b>	Hilbert Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	411	
<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>08/20/2020 12:00 PM</p>	<p><b>Finding:</b> The weekly minimum requirement for the beans/peas vegetable subgroup was not met for the 9-12 grade group at lunch during the review period. Refried beans were served on Tuesday 2/4/20 in a <math>\frac{3}{8}</math> cup serving, which is short of the weekly requirement of <math>\frac{1}{2}</math> cup.</p> <p><b>Corrective Action:</b> Describe specifically how the weekly minimum requirement for the bean/pea subgroup will be met for lunch during the week of review (e.g. portion sizes increased, additional menu items, product replacements, etc.).</p>
<b>Site Name</b>	Hilbert Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	

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<b>Question #</b>	412		
<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 08/20/2020 12:36 PM</p>	<p><b>Finding:</b> Any menu item that has more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock.</p> <p>Continue to use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/standardized-recipes">Standardized Recipes webpage</a> (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/standardized-recipes). We also encourage viewing the webcast, "What's the Yield with Standardized Recipes?", which guides the viewer through the recipe standardization process (https://dpi.wi.gov/school-nutrition/training/webcasts#sr).</p> <p>Standardized recipes exist within the SFA, but many are not accurately reflecting what is happening in the kitchen. For more information on what essential information must be on a standardized recipe, review the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf">Standardized Recipe Checklist</a> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf).</p> <p><b>Corrective action:</b> The following recipes should be updated and submitted to reflect current practices and products:</p> <ul style="list-style-type: none"> <li>•Fiesta chicken fajita (tortilla and any other changes made)</li> <li>•Toasted turkey and cheese (turkey and bread do not match products used) Note: it is recommended that either a weight OR a volume measure is used rather than listing both for each ingredient.</li> <li>•Turkey and cheese sub (turkey does not match products used)</li> <li>•Sweet and sour meatballs (no recipe was submitted for this entrée)</li> </ul>	

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
10/01/2020	2230	700	Administrative Review	ALL				
<b>Comments</b>								
<b>Annual Financial Report</b>						<b>Created By</b>		<b>Created Date</b>
When comparing the 2018-19 Annual Financial Report and Fund 50 section of the PI-1505 report, a \$245 discrepancy was noted between the reports in the total revenues and total expenditures (the ending fund balances matched). These two reports should match. In the future, if any discrepancies are noted between these two reports, they should be investigated and resolved.								10/1/2020 3:16:28 PM
10/01/2020	2229	1219	Administrative Review	ALL				
<b>Comments</b>								
<b>Professional Standards</b>						<b>Created By</b>		<b>Created Date</b>
All school staff members with duties directly related to the school nutrition programs should complete annual civil rights training and annual professional standards training hours (based on the number of hours per week worked in food service). This could include business managers, school secretaries, and teachers that assist with the point of service. Substitute food service workers should complete civil rights training and four hours of annual professional standards training, which should be recorded on a tracking tool. As a reminder, civil rights training can be counted in the annual professional standards training hours. Please refer to the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf">Training Requirements in a Nutshell</a> document on the Professional Standards webpage for additional details (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf).								10/1/2020 3:08:18 PM
10/01/2020	2235	701	Administrative Review	ALL				

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Comments					Created By	Created Date
<b>Excess Cash Balance</b> The SFA has had an excess cash balance for several years. The SFA received a second notice of excess cash balance in spring 2020 in relation to the balance for 2018-19. The SFA submitted the required spend down plan on 6/18/2020. Please continue working on spending down the excess cash balance to draw it down to less than three months of operating expenses. Some possible ways to do this include: <ul style="list-style-type: none"> <li>• Provide reduced-price eligible students with free meals. (See USDA Memo SP 17-2014)</li> <li>• Improve quality and variety of foods offered.</li> <li>• Increase marketing of the school meal program to increase participation.</li> <li>• Purchase additional or updated kitchen equipment if needed.</li> <li>• Provide additional training to staff, which can include sending staff to conferences on school nutrition related topics.</li> <li>• Offer more local products or start a Farm to School program.</li> <li>• Carryover of the funds to be expended in the next school year or long range planning for the improvement of the school food service under a plan approved by SNT</li> </ul>						10/2/2020 3:04:34 PM
10/01/2020	2228	803	Administrative Review	ALL		
Comments						
<b>Civil Rights Complaints Procedures</b> Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous. All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx">Template Civil Rights Complaint Procedures</a> found on the Civil Rights webpage to create written procedures (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx).  An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.  If a complaint of discrimination is received at your district, the following procedures should be followed: <ol style="list-style-type: none"> <li>1. Document the complaint using the <a href="http://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf">USDA Program Discrimination Complaint Form</a> (http://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).</li> <li>2. Submit complaints within five days of receiving the complaint to: Wisconsin Department of Public Instruction (DPI) Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 Fax: (608) 267-0363 Email: <a href="mailto:jessica.sharkus@dpi.wi.gov">jessica.sharkus@dpi.wi.gov</a>.</li> <li>3. Maintain a Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members who have a legitimate need to know.</li> </ol>						10/1/2020 2:48:18 PM
10/01/2020	2227	805	Administrative Review	ALL		
Comments						
<b>Special Dietary Needs</b> 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 (https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs).  A signed medical statement from a licensed medical practitioner (in Wisconsin 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.						10/1/2020 2:46:38 PM
10/01/2020	2226	305	Administrative Review	ALL		

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Comments				
Field Trip Meals	Created By	Created Date		
<p>When SFAs offer field trip meals, the point of service (POS) for these meals must meet the standard POS requirements. As a reminder, the POS is the point when it can be accurately determined that an eligible child received a reimbursable meal or milk.</p> <p>In the 19-20 school year, student accounts were charged for field trip meals after the in-person lunch period based on who had ordered a field trip meal. In this model, students that were sick or did not take their ordered meal had their accounts corrected after-the-fact. The charges were based on which students ordered a meal, and not on which students actually received a reimbursable meal at lunch time, as POS check off sheets have not been used by teachers on the field trips. Additionally, the food safety plan does not contain a standard operating procedure (SOP) for field trip meals.</p> <p>Please work on modifying the POS system so that students are checked off by an adult as they take their meal at lunchtime on the trip. Completed sheets should be returned to food service and used for charging student accounts. Additionally, please develop a field trip meal SOP and incorporate it into the food safety plan. The Field Trip meal resources on the <a href="#">Menu Planning webpage</a> can be of assistance for these items (<a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning</a>).</p>		10/1/2020 2:35:29 PM		
10/01/2020	2234	113	Administrative Review	ALL
Comments				
Sharing of Information and Disclosure	Created By	Created Date		
<p>The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits. The SFA 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. The SFA uses the DPI template Sharing of Information form for this purpose.</p> <p>Additionally, 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 on file at the district. A <a href="#">template Disclosure of Free and Reduced Price Information form</a> is located on the Free and Reduced Meal Eligibility webpage (<a href="http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx">http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx</a>). Please ensure staff that receive free/reduced-price meal eligibility information have an updated disclosure agreement on file.</p>		10/2/2020 2:16:30 PM		
10/01/2020	2233	1004	Administrative Review	ALL
Comments				
Local Wellness Policy Documentation	Created By	Created Date		
<p>Documentation pertaining to the LWP should be kept on file in the SFA to show that requirements are being met. This includes a roster of stakeholders involved in the LWP development/implementation/revision, records of when and how the policy is revised, where the policy is available publicly, how potential stakeholders are notified of their ability to participate in the LWP, and any information pertaining to the assessment of the policy.</p> <p>The <a href="#">final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule</a> requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the LWP (<a href="https://www.fns.usda.gov/school-meals/fr-072916c">https://www.fns.usda.gov/school-meals/fr-072916c</a>). It is strongly recommended that the SFA make efforts to recruit additional stakeholders to obtain input from a diverse group, as is required by USDA, and permit this group to participate in the annual meeting regarding the wellness policy.</p>		10/2/2020 2:11:16 PM		
10/01/2020	2232	1005	Administrative Review	ALL
Comments				
Local Wellness Policy Triennial Assessment	Created By	Created Date		
<p>SFAs must complete an assessment of their local wellness policy (LWP) at least once every three years. Additionally, SFAs must review and update the content of the policy periodically (annually is recommended). This suggested annual review and policy update is separate from the triennial assessment.</p> <p>The SFA completed the waiver to extend the due date of the triennial assessment to 6/30/2021. 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.</p>		10/2/2020 2:03:36 PM		

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<p>SFAs must use the <a href="#">Wisconsin Local Wellness Policy Triennial Assessment Report Card</a> in order to fulfill the triennial assessment requirement which can be found on the Local Wellness Policy webpage (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx</a>). 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.</p>										
10/01/2020	2231	305	Administrative Review	ALL						
Comments										
Unpaid Meal Charge Policy					Created By	Created Date				
<p>The SFA has an unpaid meal charge policy and distributes it to all households in back to school packets. However, the policy is not specific enough to adequately inform households of consequences of negative balances. As it is written, the policy does not specify the permissible negative balance threshold. It instead states, "Students may be permitted to accumulate negative food service account balance as determined by the District Administrator. The District Administrator shall determine the manner of determining permissible account balances by grade level."</p> <p>During the review, the SFA indicated that there are not many issues with unpaid meal charges and the policy is vague to allow case-by-case assessments. It was also stated that letters are sent to households with negative balances, students are never denied a meal regardless of their meal balance, and alternate meals are not utilized for students with unpaid meal charges. However, having a specific policy for staff members and family members to reference that is consistently implemented is needed.</p> <p>Please work on revising the unpaid meal charge policy so that it is more detailed and clearly communicates the permissible negative balances and specific courses of action/consequences for negative balances.</p> <p>Further, the SFA occasionally has financial donations that are used to reduce or eliminate household's unpaid meal charges. Currently the business manager and superintendent decide which households to assist with donations without a specific set of criteria. It is highly recommended to develop written, consistent criteria for distributing these donations to ensure equitable assistance to families.</p> <p>Please reference the resources in the Unpaid Meals section of the <a href="#">Financial Management webpage</a> including (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/financial-management">https://dpi.wi.gov/school-nutrition/program-requirements/financial-management</a>):</p> <ul style="list-style-type: none"> <li>• Unpaid Meal Charges In a Nutshell</li> <li>• Overcoming the Unpaid Meal Challenge Proven Strategies from Our Nation's Schools (page 46)</li> <li>• Unpaid Meal Charges Guidance Q&amp;A</li> <li>• Financial Questions &amp; Answers (#16)</li> </ul>						10/2/2020 1:55:07 PM				
08/24/2020	2208		Administrative Review		FSD					
Comments										
Buy American					Created By	Created Date				
<p>Food products used for the school meals program must have documentation if they are non-domestic. Further information can be found in the <a href="#">Buy American in a Nutshell</a> (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf</a>). Please complete <a href="#">non-domestic documentation</a> for any products at the school and the off-site kitchen (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx</a>). Reach out to the Public Health Nutritionist with any questions.</p>						8/24/2020 3:12:56 PM				
08/20/2020	2207		Administrative Review		FSD					
Comments										
Production Records – Fruit and Veggie					Created By	Created Date				
<p>Fruit and Veggie production records should include units for the amount prepared and leftover. Additionally, it is recommended that the crediting column be reviewed for accuracy (for example, apples are shown as crediting as 1/4 cup).</p>						8/20/2020 12:49:22 PM				
08/20/2020	2206		Administrative Review		FSD					



# Administrative Review Report

Hilbert School District

Comments									
Weight vs Volume Measurements					Created By			Created Date	
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). It is important that portion sizes accurately reflect that amount provided to students to avoid confusion. However, it can be helpful to record both the portion size AND serving utensil used.								8/20/2020 12:46:40 PM	
08/20/2020	2205	409	Administrative Review	Hilbert Hi	FSD				
Comments									
Production Records - Organization					Created By			Created Date	
In order to properly document production, each menu item should be recorded separately on the production record, unless part of a standardized recipe. Therefore, the chicken patty and spicy chicken patty should be recorded on separate lines. This will also aid in purchasing and forecasting the correct amounts for future service.								8/20/2020 12:17:40 PM	
07/07/2020	2160	801	Administrative Review	ALL					
Comments									
Public Release					Created By			Created Date	
<p>The purpose of the public release is to inform the public that free and reduced-price meals are available at the school. SFAs must annually distribute the public release to:</p> <ul style="list-style-type: none"> <li>• Local news media</li> <li>• Grassroots organizations (local organizations providing services to populations in need such as a food pantry, public library, post office, local church, etc.)</li> <li>• Local employment office</li> <li>• Major employers contemplating or experiencing large layoffs</li> </ul> <p>SFAs are allowed to, but not required to, pay to have the public release published. SFAs must maintain documentation of whom the public release was sent to along with the specific materials distributed.</p> <p>The public release was sent to the local newspaper and to St. Vincent de Paul for the 2019-20 school year. This meets the requirement to send the public release to a media outlet and a grassroots organization. Please ensure that it is documented annually where the public release is sent/posted.</p>								7/7/2020 2:47:40 PM	
07/07/2020	2159	1600	Administrative Review	ALL					
Comments									
Breakfast Program					Created By			Created Date	
<p>The SFA currently does not offer breakfast at any schools. It is highly encouraged to explore the feasibility of offering breakfast and research the various service models. Offering breakfast can be an excellent way to ensure students begin the day with a nutritious meal and are ready to learn. Further, breakfast programs can generate additional revenue for the food service account.</p> <p>Please reference the <a href="https://dpi.wi.gov/school-nutrition/programs/school-breakfast">School Breakfast Program webpage</a> for information about starting a breakfast program (https://dpi.wi.gov/school-nutrition/programs/school-breakfast). Please contact the <a href="https://dpi.wi.gov/school-nutrition/directory">School Nutrition Team</a> with any questions regarding adding this program (https://dpi.wi.gov/school-nutrition/directory). There is a team of breakfast specialists that can answer any questions and assist in planning and troubleshooting.</p>								7/7/2020 1:54:45 PM	
07/07/2020	2158	1601	Administrative Review	ALL					
Comments									
Summer Food Service Program Promotion					Created By			Created Date	
<p>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.</p> <p>SFAs can inform families of summer meals via the following methods:</p> <ul style="list-style-type: none"> <li>• Promotion of the summer meals locator on the <a href="https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site">DPI Summer Meals webpage</a> (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)</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 Summer Food Service Program webpage</li> </ul>								7/7/2020 1:51:14 PM	
07/07/2020	2157		Administrative Review						

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Hilbert School District

Comments									
Non-Program Foods				Created By	Created Date				
<p>The SFA completed the non-program foods revenue tool as required. The tool indicated compliance with the revenue requirements, however there were several minor errors in the tool. Correction of these errors did not result in a different outcome in the tool. When completing the DPI tool in the future, be sure to:</p> <ul style="list-style-type: none"> <li>• use the weighted average for the student paid lunch prices (not simple average)</li> <li>• include the Special Milk Program information in the Program Foods section</li> <li>• ensure the raw food cost for the student lunches, adult lunches, and St. Mary's lunches are the same if menu is same</li> <li>• ensure reimbursement amounts for student lunches include the \$0.07 performance-based reimbursement</li> </ul>					7/7/2020 1:18:25 PM				
07/07/2020	2156		Administrative Review						
Comments									
Special Milk Program				Created By	Created Date				
<p>The review site was the high school, which does not offer the Special Milk Program (SMP). However, the elementary school does offer the SMP. Beginning on October 1, 2017, the updated Infant and Preschool meal pattern, also known as the Child and Adult Care Food Program (CACFP) meal pattern, replaces other meal pattern options for SFAs serving infants and/or children aged 1-5 years old and not yet in kindergarten. The Infant and Preschool meal pattern requirements were updated to better align them with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. These updates do not allow flavored milk to be served to children five years old or younger and not yet in kindergarten, which also applies to SMP.</p> <p>The SFA currently offers flavored milk in the SMP which does not comply with this requirement. Please work towards compliance in this area by ceasing service of flavored milk in SMP. Please reference the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool">Feeding Infants and Preschool webpage</a> and well as the <a href="https://dpi.wi.gov/school-nutrition/programs/milk-programs/special-milk">SMP webpage</a> (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool">https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool</a>; <a href="https://dpi.wi.gov/school-nutrition/programs/milk-programs/special-milk">https://dpi.wi.gov/school-nutrition/programs/milk-programs/special-milk</a>).</p>					7/7/2020 1:10:05 PM				
07/07/2020	2155	1207	Administrative Review	ALL					
Comments									
Professional Standards Two Year Flexibility				Created By	Created Date				
<p>SFAs may utilize the two year flexibility offered by the state agency for professional standards training. The SFA may define a two year period and allow staff members to complete twice their annual training hour requirements over two years, however some training must be completed each year. For example, a full time staff member could complete 12 hours of training over the defined two year period. This option does not require additional approval from the state agency.</p>					7/7/2020 12:59:23 PM				
07/07/2020	2154	1000	Administrative Review	ALL					
Comments									
Local Wellness Policy Improvements				Created By	Created Date				
<p>While the SFA's wellness policy does meet most of the minimum content requirements, there are several ways the policy could be improved. The SFA should consider adding more specific language and defined, measurable goals. Specifically, the language regarding nutrition promotion and the triennial assessment could be improved upon. Please review the LWP checklist and LWP builder for assistance in developing this necessary policy content.</p>					7/7/2020 12:57:20 PM				
07/07/2020	2152	200	Administrative Review	ALL					Kirsten Voss
Comments									
Verification Reporting				Created By	Created Date				
<p>There was a slight discrepancy between the number of approved applications reported on the Verification Collection Report (15 applications) and the verification report from the SFA's software system (17 applications). The application pool used for verification should consist of all of the approved applications for the school year as of October 1. Going forward, please ensure that the number of applications used for the pool is accurate so that the sample selected can also be accurate. It is recommended to further investigate this discrepancy in application count. Please review the <a href="https://fnsp-prod.azureedge.net/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf">Eligibility Manual</a> and <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vcr-instructions.pdf">VCR Instructions</a> as needed (<a href="https://fnsp-prod.azureedge.net/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf">https://fnsp-prod.azureedge.net/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf</a>; <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vcr-instructions.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vcr-instructions.pdf</a>).</p>					7/7/2020 12:46:49 PM				
06/01/2020	2071	900	Administrative Review	ALL					Kirsten Voss

# Administrative Review Report

Hilbert School District

Comments					
On-Site Monitoring Forms				Created By	Created Date
While the SFA operates three school sites according to the online contract, all school sites are located in the same building. The food service director has direct daily oversight for all sites and therefore on-site monitoring is not required. The director may choose to complete the on-site monitoring forms as desired if it will help maintain program oversight.					6/1/2020 3:41:23 PM
06/01/2020	2070	305	Administrative Review ALL		
Comments					
Visiting Students				Created By	Created Date
It is allowable to charge visiting students of school age the paid student lunch price and claim them in the paid category. This is not required, but it is an option that may be desirable especially if non-enrolled school aged children frequently visit the district during meal periods.					6/1/2020 3:32:55 PM