



## **Child Nutrition Programs – Child and Adult Care Food Program Review Report**

**Duluth ISD #709 (1000003456)**

**Sponsor Review Date: November 19, 2025**

**Date Findings Discussed with Sponsor: November 19, 2025**

**Corrective Action Due Date: January 16, 2026**

**Site Reviewed and Review Date: Denfeld Senior High School - November 19, 2025**

**Month of Review: October 2025**

**Lead Reviewer and Additional Team Members: Nancy Brady, R.D., SNS, CFPM and Christine Miller**

**Sponsor Representative: Sheila Oak, Food Service Director**

**Instructions: Please utilize this format to develop a corrective action plan within the table below for each finding identified in this review report.**

**1. Who**

List the names and job titles of all staff responsible for:

- Correcting the finding, and
- Maintaining the corrective actions going forward.

**2. What and How**

Describe the steps you have taken or will take to correct the finding(s). Include:

- Specific actions taken
- Any new or updated processes or procedures
- How often each procedure will be done, for example, daily, weekly, monthly.

**3. When**

Provide the date(s) the corrective actions were or will be implemented.

**4. Supporting Documentation**

Attach documents that support your corrective actions, if applicable. Examples include:

- Staff training records
- Meal count records
- Updated menus, procedures, or checklists

*How to Submit Your Response*

1. Save this report as a **Word** document.
2. Enter your corrective action in the 'Sponsor Corrective Action Column' next to each finding.
3. Attach your supporting documents.
4. Email the **Word** document and all attachments together to the lead reviewer.

If your corrective action response is incomplete or unclear, MDE will contact you to revise it.

*Sponsor Level Findings*

Area	Finding ID and Description	Required Corrective Action	Sponsor Corrective Action
<p>1200 Training—CACFP At-Risk Afterschool Meals Program Training Sponsoring Organization</p>	<p>1202SP. All afterschool program staff (i.e. Coordinators for DASH, Sport Teams and Debate Club) did not receive annual <i>CACFP At-Risk Afterschool Meals Program</i> training pertinent to their specific responsibilities and duties. Also, documentation (i.e. agenda, attendance date and names of participants) was not available to demonstrate that afterschool program staff received annual CACFP training.</p>	<p>Corrective Action: Describe your plan to correct this finding.</p> <p><b>Technical Assistance:</b> Require all afterschool program staff that work with students who will access the At-Risk Afterschool Meals Program to attend an annual training on the At-Risk Afterschool Meals Program. You can meet individually with staff and provide training pertinent to their specific responsibilities and duties OR use MDE’s Brighton training course available on our website (MDE-213 CACFP Annual Training for At-Risk Afterschool Care Center 2026).</p>	<p>Who: Sheila Oak DTR, Supervisor of Child Nutrition</p> <p>What and How: Require all staff involved with the afterschool meals program to meet individually with myself or a member of my office staff to get training that is pertinent to their specific duties in the meal service process. Have them sign the signature page when done training.</p> <p>When: Starting 12/1/25</p> <p>Supporting Documentation: Labeled A 3 pages</p>
<p>MDE Response to Sponsors Corrective Action Plan:</p>			
<p>1200 Training—Civil Rights Training Sponsoring Organization</p>	<p>1210SP. Staff from DASH who work with the public and participants of the CACFP At-Risk Afterschool Meals Program did not receive annual <i>Civil Rights training</i>. In addition, documentation (i.e. agenda, attendance date and names of participants) was not available to</p>	<p>Corrective Action: Describe your plan to correct this finding.</p>	<p>Who: Sheila Oak DTR, Supervisor of Child Nutrition</p> <p>What and How: Civil Rights training will be provided to the DASH staff involved in meal distribution and attendance. Foodservice employees involved in Prep and paperwork will have civil rights training annually.</p>

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	demonstrate that Civil Rights training was provided.		<p>The materials will be provided to the employees involved with training or they may watch the VECTOR video until the USDA video is updated.</p> <p>When: 12/1/2025</p> <p>Supporting Documentation: Labeled B 29 pages</p>
MDE Response to Sponsors Corrective Action Plan:			
<p><b>Observation and Recommendation:</b> It was noted during the review that all district employees received Civil Rights training produced by Vector Solution K-12 edition. Vectors civil rights training module has some outdated information in it but it can still be used until USDA updates their materials and training tools.</p>			

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<p>1600 Eligibility— Program and Participant</p>	<p>1604SP. Approximately half of the total number of At-Risk afterschool suppers that were served and claimed for reimbursement during this school year were provided to students who were <b>not</b> participating in an eligible afterschool care program. Many students were served the cold bagged supper and either left the school site or remained on site to consume the meal but did not plan to participate in any afterschool program.</p> <p>This is a repeat finding that was cited during an administrative review conducted in April 2023.</p>	<p>Corrective Action: Describe your plan to correct this finding.</p> <p><b>Technical Assistance:</b></p> <p><b>Participant Eligibility:</b> At-Risk Afterschool Programs may claim reimbursement <b>ONLY</b> for meals and/or snacks served to students (age 18 or under) who participate in an eligible Afterschool Program and who are “in the care” of the after-school program staff and only on days when the qualifying enrichment or educational program is offered. In addition, all meals and/or snacks served in the At-Risk Afterschool Meals Program must be eaten on site in a congregate setting.</p> <p><b>Program Eligibility:</b> Afterschool programs must be organized primarily to provide “care for children” after school or on the weekends, holidays, or school release days during the regular school year. Each identified afterschool program must provide organized regularly scheduled education or enrichment activities in a structured and supervised environment.</p>	<p>Who: Sheila Oak DTR, Supervisor of Child Nutrition—Responsible for corrective action and ongoing review of process</p> <p>What and How: Team or program leaders will be responsible for Picking up and distributing the bag meals, as well as maintaining the attendance and meal taken paperwork.</p> <ol style="list-style-type: none"> <li>1. Program coaches or leaders will contact the Child Nutrition program of their desire to have afterschool meals for their group of students staying after school to participate in their enrichment program or sport.</li> <li>2. The team leader will be given the program training materials and Civil Rights training materials to review before they begin their role in the distribution of meals.</li> <li>3. The Team leader will be responsible for keeping the attendance sheet as well as the meal taken sheet that is given to them daily with the meals.</li> <li>4. The meals will be picked up from the cafeteria by 2:45 daily. The team leader or coach will distribute the meals to their group and the meals will be eaten as a group within the school district buildings.</li> <li>5. The attendance sheets will be returned the next day with the cooler and any unused meals.</li> </ol>

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			<p>6. Meal counts are to be lowered or raised daily by contacting the Child Nutrition office or the cafeteria.</p> <p>When: This new process of distribution began on 12/1/2025.</p> <p>Supporting Documentation: Online DASH attendance/meal consumption sheet</p> <p>Paper meal recording sheet that will be given to new participants in the program that will not be using an online form.</p> <p>Labeled C 3 pages</p>
MDE Response to Sponsors Corrective Action Plan:			

*Site Level Findings*

1000002233 – Denfeld Senior High School

**DATE OF VISIT**

Area	Finding ID and Description	Required Corrective Action	Sponsor Corrective Action
300 Meal Counting/Claiming— Day of Review	302. Daily attendance information was <b>only</b> collected and recorded for students who participated in afterschool programs offered by DASH. No other afterschool programs offered at Denfeld High School collected/recorded or maintained daily attendance information of their program participants.	<p>Corrective Action: Describe your plan to correct this finding.</p> <p><b>Technical Assistance:</b> Attendance information must be recorded daily on a roster of student’s names for each eligible afterschool program. Site staff must compare daily meal and/or snack counts to daily attendance information to ensure that the number of meals and/or snacks served does not exceed the total number of students in attendance.</p>	<p>Who: Sheila Oak DTR, Supervisor of Child Nutrition—Responsible for corrective action and ongoing review of process</p> <p>What and How: Team or program leaders will be responsible for Picking up and distributing the bag meals, as well as maintaining the attendance and meal taken paperwork.</p> <ol style="list-style-type: none"> <li>1.Program coaches or leaders will contact the Child Nutrition program of their desire to have afterschool meals for their group of students staying after school to participate in their enrichment program or sport.</li> <li>2.The team leader will be given the program training materials and Civil Rights training materials to review before they begin their role in the distribution of meals.</li> <li>3.The Team leader will be responsible for keeping the attendance sheet as well as the meal taken sheet that is given to them daily with the meals.</li> <li>4. The meals will be picked up from the cafeteria by 2:45 daily. The team leader or coach will distribute the meals to their group and the meals will be eaten as a group within the school district buildings.</li> <li>5.The attendance sheets will be returned the next day with the cooler and any unused meals.</li> </ol>

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MDE Response to Sponsors Corrective Action Plan:			
<p>300 Meal Counting/Claiming— Five Day Reconciliation assessment conducted during the administrative review in November 2025.</p>	<p>304. After reviewing the “five-day reconciliation period,” which is assessed during our administrative review of Denfeld’s November supper meal counts, versus available attendance information, it was noted that the site's daily meal counts exceeded attendance information on the following days: November 11, 13, 17 and 18.</p>	<p>Corrective Action: When preparing your November 2025 claim for reimbursement kept in mind that the number of suppers that can be claimed for reimbursement on a daily basis can only reflect the number of students who attended the afterschool programing in DASH and received a meal.</p>	<p>Who: Sheila Oak, DTR, Supervisor of Child Nutrition</p> <p>What and How: The meal counts of students that were attending the afterschool DASH program and the students that punched in for meals were cross referenced and only those students attending DASH will be claimed for having a meal.</p> <p>When: When preparing the November claim on December 1, 2025.</p> <p>Supporting Documentation:</p>

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			<p>The comparison sheet and the final total for the claim.</p> <p>Labeled D 3 sheets (I did a revised claim after finding a math error)</p>
MDE Response to Sponsors Corrective Action Plan:			
<p>300 Meal Counting/Claiming—Review Period</p>	<p>305. Daily attendance records were not accurately maintained during the review period for all At-Risk afterschool participants. Attendance records were only maintained for students attending afterschool programs offered by DASH. No other afterschool programs (i.e. Sport Teams, Debate, etc.) recorded or submitted daily attendance information on a roster of student’s names.</p>	<p>Corrective Action: Describe your plan to correct this finding.</p> <p><b>Technical Assistance:</b> Regulations state that At-Risk Afterschool Programs may claim reimbursement <b>ONLY</b> for meals and/or snacks served to students who participate in an approved Afterschool Program.</p>	<p>Who: Sheila Oak DTR, Supervisor of Child Nutrition—Responsible for corrective action and ongoing review of process</p> <p>What and How: Team or program leaders will be responsible for Picking up and distributing the bag meals, as well as maintaining the attendance and meal taken paperwork.</p> <ol style="list-style-type: none"> <li>1. Program coaches or leaders will contact the Child Nutrition program of their desire to have afterschool meals for their group of students staying after school to participate in their enrichment program or sport.</li> <li>2. The team leader will be given the program training materials and Civil Rights training materials to review before they begin their role in the distribution of meals.</li> <li>3. The Team leader will be responsible for keeping the attendance sheet as well as the meal taken sheet that is given to them daily with the meals.</li> <li>4. The meals will be picked up from the cafeteria by 2:45 daily. The team leader or coach will distribute the meals to their group and the meals will be eaten as a group within the school district buildings.</li> </ol>

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			<p>5.The attendance sheets will be returned the next day with the cooler and any unused meals.</p> <p>6. Meal counts are to be lowered or raised daily by contacting the Child Nutrition office or the cafeteria.</p> <p>When: : This new process of distribution began on 12/1/2025.</p> <p>Supporting Documentation: Online DASH attendance/meal consumption sheet</p> <p>Paper meal recording sheet that will be given to new participants in the program.</p> <p>Labeled C</p>
MDE Response to Sponsors Corrective Action Plan:			
<p>300 Meal Counting/Claiming— Review Period</p>	<p>308., 314f and 314g. Daily meal counts (suppers) reported during the review month of October 2025 were greater than daily attendance information on the following dates: October 2, 6, 7, 8, 9, 13, 14, 15, 20, 21, 22, 23, 27, 28, 29, and 30.</p> <p>A combination of these two issues contributed to this finding: 1. Suppers were offered and served to students who were not “in care,” or in other words not participating in an afterschool program. Specifically, students received a supper and either left</p>	<p>Corrective Action: Describe your plan to correct this finding.</p> <p>Meal count adjustments are summarized on the “Claim for Reimbursement Adjustment Form At Risk” an Excel spreadsheet which is attached to the email along with this review report.</p> <p>Overpayments identified during a CACFP review are totaled and if they exceed \$600, funds must be recovered. Refer to the review cover letter/email for more information. Sponsors may appeal actions taken by the Minnesota Department of</p>	<p>Who: Sheila Oak, DTR, Supervisor of Child Nutrition</p> <p>What and How: The meal counts of students that were attending the afterschool DASH program and the students that punched in for meals were cross referenced and only those students attending DASH will be claimed for having a meal.</p> <p>When: When preparing the November claim on December 1, 2025.</p> <p>Supporting Documentation:</p>

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	<p>the school building or stayed on site but had no intention of participating in any afterschool program.</p> <p>2. Daily attendance records of students who participated in eligible afterschool programs were not kept by staff who operated these afterschool programs. If attendance records had been maintained the suppers that their participants received could have been claimed for reimbursement. The DASH afterschool program was the only group that maintained daily attendance information of their participants.</p> <p>Note: Going forward, the total number of At-Risk Afterschool Meal Program suppers that can be claimed for reimbursement can <b>ONLY</b> reflect the number of meals served to students who attend an eligible afterschool program.</p>	<p>Education (MDE) in accordance with the CACFP Appeal Procedure, which is also attached to the email along with the review report.</p> <p>If an appeal is not received within the specified time frame, MDE will adjust the claim for reimbursement.</p>	<p>The comparison sheet and the final total for the claim. The November Claim</p> <p>Labeled D</p>
MDE Response to Sponsors Corrective Action Plan:			
300 Meal Counting/Claiming— Review Period	314a. Average Daily Attendance (ADA) was incorrectly reported on the review month claim for reimbursement. An enrollment figure of 440 students was reported as the ADA instead of a calculated average number of students who attend/participate	<p>Corrective Action: Describe your plan to correct this finding.</p> <p><b>Technical Assistance:</b> To accurately calculate Average Daily Attendance (ADA) which is reported on the Monthly Claim for Reimbursement: add together daily attendance for the reporting month to equal total</p>	<p>Who: Sheila Oak, DTR, Supervisor of Child Nutrition</p> <p>What and How: I will add up the monthly attendance for the DASH program and divide it by the number of reporting days to come up with the average daily attendance</p>

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	daily in the school's afterschool programs.	<p>monthly attendance. Next, divide total monthly attendance by the number of operational days in the reporting month to equal Average Daily Attendance.</p> <p>Total Monthly Attendance ÷ Operational Days = ADA</p>	<p>When: December 1, 2025</p> <p>Supporting Documentation: Labeled E 1 page Decembers claim also shows the average daily attendance as 27. 268 divided by 10=26.8 or 27.</p>
MDE Response to Sponsors Corrective Action Plan:			
300 Meal Counting/Claiming— Review Period	314j. The sponsor incorrectly reported the total number of suppers served on the October 2025 monthly claim for reimbursement because daily totals were sourced from the Food Production Records and incorrectly included suppers served to students who were not participating in an afterschool program.	Corrective Action: Describe your plan to correct this finding.	<p>Who: Sheila Oak DTR, Supervisor of Child Nutrition—Responsible for corrective action and ongoing review of process</p> <p>What and How: Team or program leaders will be responsible for Picking up and distributing the bag meals, as well as maintaining the attendance and meal taken paperwork.</p> <ol style="list-style-type: none"> <li>1.Program coaches or leaders will contact the Child Nutrition program of their desire to have afterschool meals for their group of students staying after school to participate in their enrichment program or sport.</li> <li>2.The team leader will be given the program training materials and Civil Rights training materials to review before they begin their role in the distribution of meals.</li> <li>3.The Team leader will be responsible for keeping the attendance sheet as well as the meal taken sheet that is given to them daily with the meals.</li> <li>4. The meals will be picked up from the cafeteria by 2:45 daily. The team leader or</li> </ol>

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			<p>coach will distribute the meals to their group and the meals will be eaten as a group within the school district buildings.</p> <p>5.The attendance sheets will be returned the next day with the cooler and any unused meals.</p> <p>6. Meal counts are to be lowered or raised daily by contacting the Child Nutrition office or the cafeteria.</p> <p>7. The claim will only include meals that were counted on the attendance sheet as well as the meal taken sheet.</p> <p>When: This new process of distribution began on 12/1/2025.</p> <p>Supporting Documentation: Online DASH attendance/meal consumption sheet</p> <p>Paper meal recording sheet that will be given to new participants in the program.</p>
MDE Response to Sponsors Corrective Action Plan:			

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500 Meal Service— Day of Review	503. Not all suppers were consumed on-site.	<p>Corrective Action: Describe your plan to correct this finding.</p> <p><b>Technical Assistance:</b> Meals and/or snacks served in the CACFP Afterschool Meals Program must be consumed on-site in a congregate setting. In addition, participants can take one vegetable or one fruit or one prepackaged grain item off-site to eat at a later time. The one food item a student takes off-site must be from the students own meal or from a share table.</p>	<p>Who: Sheila Oak, DTR, Supervisor of Child Nutrition</p> <p>What and How: Educating the group leaders handing out meals to students on the rules and regulation of the meal program. Explaining that meals are to be consumed on site and that participants can take one vegetable or one fruit or one prepackaged grain item off-site to eat at a later time</p> <p>When: December 1, 2025</p> <p>Supporting Documentation: Labeled A Part of the training for group leaders</p>
MDE Response to Sponsors Corrective Action Plan:			
1600 Eligibility - Participant and Site	1603. Some At-Risk suppers are served to students who are not participating in an approved afterschool care program.	<p>Corrective Action: Describe your plan to correct this finding.</p> <p>Meal count adjustments are summarized on the “Claim for Reimbursement Adjustment Form At Risk” an Excel spreadsheet which is attached to the email along with this review report. Options you can take regarding these adjustments are discussed in the Required Corrective Action column for Area 300 Meal Counting/Claiming—Review Period,</p>	<p>Who: Sheila Oak DTR, Supervisor of Child Nutrition—Responsible for corrective action and ongoing review of process</p> <p>What and How: Team or program leaders will be responsible for Picking up and distributing the bag meals, as well as maintaining the attendance and meal taken paperwork.</p> <p>1.Program coaches or leaders will contact the Child Nutrition program of their desire to have afterschool meals for their group of</p>

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		Finding ID and Description numbers 308., 314f and 314g.	<p>students staying after school to participate in their enrichment program or sport.</p> <p>2.The team leader will be given the program training materials and Civil Rights training materials to review before they begin their role in the distribution of meals.</p> <p>3.The Team leader will be responsible for keeping the attendance sheet as well as the meal taken sheet that is given to them daily with the meals.</p> <p>4. The meals will be picked up from the cafeteria by 2:45 daily. The team leader or coach will distribute the meals to their group and the meals will be eaten as a group within the school district buildings.</p> <p>5.The attendance sheets will be returned the next day with the cooler and any unused meals.</p> <p>6. Meal counts are to be lowered or raised daily by contacting the Child Nutrition office or the cafeteria.</p> <p>When: This new process of distribution began on 12/1/2025.</p> <p>Supporting Documentation: Online DASH attendance/meal consumption sheet</p> <p>Paper meal recording sheet that will be given to new participants in the program.</p>
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