

Administrative Review Report

Boscobel Area Schools - 220609

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/24/2019	03/25/2019
On-Site Review	04/16/2019	04/18/2019
Site Selection Worksheet	01/25/2019	02/08/2019
Entrance Conference	04/16/2019	04/16/2019
Exit Conference	04/17/2019	04/17/2019

Commendations:

Thank you to the staff at Boscobel Area Schools for the courtesies extended during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests.

The staff members were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the child nutrition programs. The food service staff were welcoming and clearly dedicated to their work. The cafeteria was inviting and interactions between staff and students during meal times were positive and customer-service focused.

The determining official does a great job managing free/reduced information. There were only two errors out of the 289 student eligibility statuses reviewed, which is a very low error percentage. The business office staff members and the food service director do a good job collaborating on claiming information and other financial aspects of the programs.

The food service director was eager to learn, receptive to suggestions, and appreciative of on-site training provided. The director is very dedicated to feeding students and has a strong desire to grow the programs to meet students' needs and preferences. The colorful salad bar, use of local food items, and focus on scratch cooking were commendable.

During the first day of the on-site review, the district was affected by an area-wide internet outage. The staff members did a great job working through the review process with the added challenge of the internet outage. The back-up roster check off system had to be utilized during lunch observation due to the internet outage. This was a good opportunity to observe the back-up manual system in practice, and it appeared to be well-implemented.

The food service director's work to increase student participation in the school meals programs is commendable. It is clear that decisions are made with the students' best interest in mind and with a strong customer service focus. The wide variety of foods available on the salad bar promotes vegetable consumption and accommodates a variety of taste preferences. Additionally, it is great to see so many local foods available to students. Thank you for all that you do for the students of Boscobel Area Schools!

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Findings and Corrective Action:

Site Name	SFA-wide	
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	103	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/18/2019 09:43 AM</p>	<p>Finding: The SFA provides a fee waiver incentive to all households that complete a free/reduced meal application. Under USDA regulations, the meal application may only be used for determining free and reduced priced benefits for children participating in the school nutrition programs. Completing an application for free or reduced priced meals is completely at the discretion of the household and schools may not require or offer financial incentives to complete the application.</p> <p>CA: Please submit a detailed statement indicating the steps the district intends to take to immediately discontinue the practice of providing fee discounts in exchange for completed meal applications.</p>
Site Name	SFA-wide	
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/18/2019 08:39 AM</p>	<p>Finding: There were several allocation errors on the annual financial report (AFR). The entire transfer for bad debt was allocated to non-program foods. Revenues and expenditures were not accurately allocated to non-program foods. No expenditures were allocated to the WI School Day Milk Program. There was also a minor discrepancy in total revenues and fund balance between the AFR and PI-1505 report.</p> <p>CA: Review the AFR webcast, manual, and other AFR resources on the DPI website (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial). Submit a written plan describing how the AFR will be completed correctly in upcoming school years. Please be specific regarding how revenues and expenditures will be accurately allocated by program.</p>
Site Name	SFA-wide	
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	

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TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/17/2019 01:41 PM</p>	<p>Finding: The 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 per 7 CFR 210.14.</p> <p>CA: Complete the DPI Non-Program Foods Revenue Tool and upload into SNACS using a five day reference period from the current school year. Provide a statement of understanding that this tool is required to be completed annually and must be used to set non-program food prices. Work with the consultant after tool completion to determine if additional steps need to be taken to ensure compliance with the revenue requirements. Please review the training resources on the Financial Management and Training Webcasts webpages for assistance in completing the tool (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial; https://dpi.wi.gov/school-nutrition/training/webcasts).</p>
Site Name	SFA-wide	
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/17/2019 01:13 PM</p>	<p>Finding: Documentation regarding the public release distribution was not available, and it was unclear if it had been distributed for the 2018-19 school year.</p> <p>CA: In SNACS, list the names of 2-3 media outlets and grassroots organizations that the public release will be sent in the next school year. Please also state which staff member will be responsible for the public release going forward.</p>
Site Name	SFA-wide	
Form Name	Civil Rights (800 - 807)	
Question #	807	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/17/2019 01:19 PM</p>	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31. Additionally, student racial/ethnic data was not included on the PI-1441.</p> <p>CA: Fully complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective</p>

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		action. Please also provide a statement describing how the form will be completed fully and on time in upcoming school years.
Site Name	SFA-wide	
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/18/2019 11:32 AM	<p>Finding: The current local wellness policy (LWP) does not include all of the required content. Information regarding updating/informing the public and the triennial assessment is lacking. Additionally, all other content areas could be improved upon by adding more specific content and including measurable goals.</p> <p>CA: 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.</p>
Site Name	SFA-wide	
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/17/2019 01:10 PM	<p>Finding: One application was processed incorrectly because a reported income was not included in the calculation. This resulted in an incorrect free benefit, when it should have been reduced. Two students in the review sample were affected.</p> <p>CA: During the on-site review, the determining official sent the household an adverse action letter. After ten calendar days from the date the letter was sent, change the meal benefit statuses from free to reduced. <i>No further action required.</i></p>
Site Name	SFA-wide	
Form Name	Verification (207 - 215)	
Question #	215	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 04/17/2019 01:39 PM	<p>Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a).</p> <p>CA: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame going forward.</p>
Site Name	SFA-wide	
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/18/2019 08:45 AM	<p>Finding: Documentation of school food service staff training was not maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. While the director was able to describe training that occurred in the current school year, documentation of this training was not available.</p> <p>CA: Include all training hours completed this school year for each school food service employee on the USDA or DPI professional standards training tracking tool. Alternatively, another tracking tool of the director's choice that contains the required information could be used. Upload the completed tool into SNACS. Please also provide a statement describing how training for food service staff will be tracked going forward.</p>
Site Name	SFA-wide	
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/18/2019 09:33 AM	<p>Finding: Non-school nutrition staff who have responsibilities in the school nutrition program(s) did not receive and track job-specific training in the current school year (7 CFR 210.30). The three staff members at the district office responsible for free/reduced benefit management, financial management, and claiming must complete four hours of professional standards training annually (including civil rights training).</p> <p>CA: Submit a plan for how training requirements for these staff members will be met going forward. Please be specific regarding who will track these completed training hours and what types of trainings may be completed.</p>

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Site Name	Boscobel Middle School	
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/17/2019 01:38 PM</p>	<p>Finding: The food safety plan did not contain standard operating procedures (SOPs) for sharing tables and milk barrels.</p> <p>CA: Develop and implement SOPs for these. Sanitarian approval must be obtained for the sharing tables to ensure compliance with all local, state, and federal food codes. Submit copies of the SOPs, including proof of sanitarian approval for the sharing tables. There are template SOPs available on the Food Safety webpage that can be adapted to be site-specific—"Use of Milk Barrels: Monitoring of Temperature Option" and "Fact Sheet for Sharing Table in School Nutrition Programs" (https://dpi.wi.gov/school-nutrition/food-safety).</p>

Site Name	Boscobel Middle School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/06/2019 03:33 PM</p>	<p>Finding: Signage was not posted at lunch to show students what makes up a reimbursable meal. Breakfast signage was posted throughout the serving line but did not specify the number of food items that each menu item was planned as and did not include specifically that students must select at least ½ cup fruit. 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 the Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p>CA: Submit pictures of complete signage posted near the lunch and breakfast service lines.</p>

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Site Name	Boscobel Middle School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/06/2019 03:24 PM	<p>Finding: The $\frac{1}{3}$ cup of oatmeal with apples offered at breakfast during the week of review credited as less than 1.0 ounce equivalent (oz eq) of grain. This must be either bundled with other grain items to be counted as an item for breakfast meal pattern, or the serving size should be increased. An item is defined as 1.0 oz eq grain, 1.0 oz eq meat/meat alternate, $\frac{1}{2}$ cup of fruit/vegetable, or 1 cup of milk.</p> <p>CA: Submit a statement explaining how the oatmeal with apples option will be offered going forward.</p>
Site Name	Boscobel Middle School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/06/2019 03:22 PM	<p>Finding: The breakfast and lunch production records submitted for the week of review were missing required information. Additionally, production records were not being kept for the daily salad bar. Invoices were used to credit the additional meat/meat alternate and vegetable subgroups offered on the salad bar for the week of review.</p> <p>CA: Submit one week of completed production records for breakfast, lunch, and the salad bar.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/06/2019 03:22 PM	<p>Finding: There was a daily fruit shortage at lunch during the week of review. Middle school students were offered less than the required $\frac{1}{2}$ cup of fruit at lunch on Monday, Tuesday, Wednesday, and Friday. This also resulted in a weekly fruit shortage at lunch. Technical assistance was provided on the difference between the planned menu and Offer versus Serve.</p>

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		<p>CA: The production records submitted for corrective action will be used to show that the middle school students are now being offered at least ½ cup of fruit daily at lunch.</p> <p><i>Fiscal action is required for select repeat violations found during an Administrative Review (AR). Because a daily fruit shortage at lunch was found during the last AR as well as the current AR, fiscal action will be applied. Boscobel Area Schools uses a district-wide menu, so fiscal action must be assessed for all schools within the district offering meals with a daily fruit shortage at lunch. There will be a re-claim for meals for all meals at each site with a daily fruit shortage at lunch.</i></p>
Corrective Action History	Flagged 05/06/2019 03:27 PM	<p>Finding: Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning 50% or more of the product needs to be whole grain. The English muffin used in the Bulldog McMuffin and the pretzel bun offered during the week of review were not whole grain-rich.</p> <p>CA: Find new, whole grain-rich version of these products and submit the nutrition facts label, ingredient list, and product formulation statement (if applicable).</p>
Site Name	Boscobel Middle School (and SFA-wide)	
Form Name	SFA On-Site Monitoring (901 - 904)	
Question #	901	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/17/2019 01:25 PM	<p>Finding: The SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p>CA: Complete all required on-site monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA. Submit a plan on how on-site monitoring will be completed for each school and program moving forward and the position responsible. On-site monitoring forms can be found on the Administrative Review webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review).</p>
Site Name	Boscobel Middle School	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1105	

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TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/06/2019 03:37 PM	<p>Finding: Beverages from the coffee cart are not allowable for middle schools students. Only plain water, 100% juice, or milk are allowable Smart Snack beverages for middle school.</p> <p>CA: State what will be done with the coffee to comply with the Smart Snacks regulations for middle school students.</p>
Site Name	Boscobel Middle School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/18/2019 08:40 AM	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>CA: The food service director promptly posted the most recent inspection report in an appropriate location upon request during the on-site review. <i>No further action required.</i></p>
Site Name	Boscobel Middle School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	TA Log# exists	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/06/2019 03:16 PM	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: canned pineapple (Thailand) and green peppers (Mexico).</p> <p>CA: 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>
Site Name	Boscobel Elementary School	
Form Name	Wisconsin School Day Milk Program	
Question #	1	
TA Log #	No TA Log# found	
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 04/17/2019 12:57 PM	<p>Finding: The Wisconsin School Day Milk Program agreement on file with DPI is from 1996 and does not reflect current practices for the program in the SFA.</p> <p>CA: Complete and submit an updated agreement to the consultant for approval (https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf).</p>
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Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site
05/06/2019	655	1105	Administrative Review	Boscobel Middle School

Comments

	Created Date
<p>Coffee Carts</p> <ul style="list-style-type: none"> Coffee and espresso drinks are allowable beverages at the high school (grades 9-12) level. Ensure products are offered in acceptable portion sizes to be compliant with the Smart Snacks standards. Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar needs to be added together when determining if the beverage meets the guidelines below. <ul style="list-style-type: none"> Beverage Guidelines: <ul style="list-style-type: none"> calorie-free beverages (for black coffee only) <ul style="list-style-type: none"> <5 calories per 8 fl. oz.; ≤10 calories per 20 fl. Oz. Maximum serving size: 20 fl. oz. lower-calorie beverages (for coffee with cream and/or sugar) <ul style="list-style-type: none"> ≤40 calories per 8 fl. oz.; ≤60 calories per 12 fl. oz. Maximum serving size: 12 fl. oz. To help determine if coffee drinks are compliant, utilize the Alliance for a Healthier Generation Smart Snacks Product Calculator (https://foodplanner.healthiergeneration.org/calculator/). If they are, a reference sheet can be printed showing compliance directly from the website as record keeping documentation. 	5/6/2019 3:49:54 PM

TA Date	TA Log #	Question #	TA Area	Site
05/06/2019	654	1104	Administrative Review	Boscobel Middle School

Comments

	Created Date
<p>Smart Snacks in Schools</p> <ul style="list-style-type: none"> Foods and beverages sold in schools, including foods sold a la carte, must meet both the general standards and nutrient standards unless the sales qualify for an exemption. Entrees are exempt from the standards on the day of and the day after they are served as part of reimbursable meal. More information can be found on the Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks). 	5/6/2019 3:48:46 PM

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- 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 fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the Smart Snacks webpage, under the resources heading.
- The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed. School food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

05/06/2019	653	604	Administrative Review	Boscobel Middle School
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Comments

Created Date

Dietary Specifications

- The potato soup is likely adding significant calories and sodium for only crediting as $\frac{1}{4}$ cup starchy vegetable. Consider revising the recipe to increase the vegetable contribution while also lowering the calorie and sodium content.
- Allowing students to select multiple meat/meat alternate (M/MA) and grain foods at breakfast makes it more challenging to meet the dietary specifications. Allowing students to take M/MA options from the salad bar in addition to the entree also makes meeting the dietary specifications challenging. However, based on observations while on-site, few students took the maximum foods offered at breakfast and usage of the M/MA on the salad bar was reasonable and strictly monitored. Please continue to monitor usage to remain within the dietary specifications.

5/6/2019 3:47:55 PM

05/06/2019	652	500	Administrative Review	Boscobel Middle School
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Comments

Created Date

Planned Menu and Offer versus Serve

- There was some confusion over the difference between Offer versus Serve (OVS) and the planned menu. The planned menu must be in compliance with all meal pattern requirements, both daily and weekly. OVS occurs only during meal service. Therefore, the printed menu, recipes, and portion sizes on production records should reflect the menu and portion sizes as planned. Under OVS, students must *select* at least $\frac{1}{2}$ cup of fruit, vegetable or a combination as one of their three components. However, in order to meet minimum meal pattern requirements, they must be *offered* at least $\frac{3}{4}$ cup of vegetable and $\frac{1}{2}$ cup of fruit (for grades K-8).
- Foods such as the cheese slice offered alongside the hamburger do not need to be listed as "optional" on the production record. It may be included as part of the planned menu, with students having the option to decline the foods offered under OVS.

5/6/2019 3:47:21 PM

05/06/2019	651	410	Administrative Review	Boscobel Middle School
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Comments					Created Date
Applesauce Cups When packaged by weight, 4.0 ounces of applesauce does not equal 4.0 fluid ounces (1/2 cup) fruit. A 4.0 ounce applesauce cup must be paired with another fruit to satisfy the required ½ cup fruit and/or vegetable requirement for a reimbursable meal. If one applesauce cup is desired to meet the ½ cup fruit requirement, find applesauce cups that are at least than 4.5 ounces by weight, such as the 4.5 ounce applesauce cup offered by USDA.					5/6/2019 3:46:34 PM
05/06/2019	650	410	Administrative Review	Boscobel Middle School	
Comments					Created Date
Juice Limit and Smoothies The pureed fruit included in smoothies is considered juice and must be taken into consideration when determining the weekly limit on juice. Students may be limited to only the juice or smoothie on days when both are offered.					5/6/2019 3:46:08 PM
05/06/2019	649	409	Administrative Review	Boscobel Middle School	
Comments					Created Date
Standardized Recipes Standardized recipes are required for all menu items that have more than one ingredient, including spices. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by the specific foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). It is recommended to view 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).					5/6/2019 3:45:41 PM
05/06/2019	648	409	Administrative Review	Boscobel Middle School	

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<p>Production Records</p> <p>Production records are intended to be useful tools to record information prior to production, during production, and following production. They also serve to document that food meeting the meal pattern was served in the appropriate serving sizes. The production records submitted for the week of review were missing information. Technical assistance was provided during the on-site review on the DPI production record templates and the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). In addition to the requirements, please consider the following technical assistance:</p> <ul style="list-style-type: none"> • Be specific on production records about the identity, brand, and description of the items served. Instead of “fruit cup,” list the actual varieties offered. List the specific types of cereal or cereal bars offered, rather than just listing “cereal” or “cereal bar” as these do not indicate exactly what was served. Alternatively, consider developing a recipe for the varieties offered. The milk recipe process may be used to develop such recipes. • The specific types of fruit offered should be recorded on the daily production records. • Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. • Milk is a required component as part of the School Breakfast Program (SBP) and National School Lunch Program (NSLP). Daily usage by milk type must be recorded on the production records (e.g., skim chocolate milk, 1 percent white milk). If it becomes too time- or labor-intensive to record milk usage by type on production records, consider using a Milk Recipe (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/milk-recipe-instructions.doc). A milk recipe is documentation of average milk usage by meal (breakfast or lunch) and grade group. When a milk recipe is on file, total milk usage must still be recorded on production records. Milk recipes must be updated twice per year or when you notice that students’ preferences have changed. • At the time of the onsite review, the DPI lunch production record template was being used. It is encouraged to continue to use this template for lunch and implement the breakfast and salad bar production record templates to ensure all necessary information is recorded. • Please refer to the Production Record Requirements for a list of all mandatory items that must be listed and filled in on production records (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). 				5/6/2019 3:45:28 PM
05/06/2019	647	409	Administrative Review	Boscobel Middle School
Comments				Created Date
<p>Two Methods of Crediting Grains</p> <ul style="list-style-type: none"> • Grains can be credited based on weight using Exhibit A (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf). If a product is not listed in Exhibit A, a signed Product Formulation Statement (PFS) must be obtained from the manufacturer that lists the <i>grams of creditable grain</i> in the product. 				5/6/2019 3:45:11 PM

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- Exhibit A is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1.0 oz eq for each specific group. Exhibit A groups all grain products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:
 - Group A: these products are hard and crunchy, dry and lightweight. Per ounce, they contain a good deal of grain.
 - Group B: whether serving bagels, pizza crusts or tortillas, 1.0 ounce of these products all credit the same towards the meal pattern (1.0 ounce by weight = 1.0 oz eq grain).
 - Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1.0 ounce of pancake does not credit as 1.0 oz eq like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz eq grain.
- Exhibit A can be used to credit any of the products that appear in the table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

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Crediting and Documentation

- The [USDA Food Buying Guide for Child Nutrition Programs](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on “food items search” and type in a specific food in the “keywords” search box. Many different options may appear. Find the one that exactly matches the desired product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.
- The FBG also provides the raw to cooked yields for products, which is essential when developing standardized recipes that provide the desired crediting.
- Most fruits and vegetables credit by volume served (e.g., ½ cup peaches, drained will credit ½ cup fruit) and the FBG will note if the crediting is different based on volume served (e.g., one medium banana credits ½ cup fruit). Most meat/meat alternates and grains credit by weight (i.e., 2 ounces of cooked, plain chicken breast credit 2.0 oz eq meat/meat alternate; 1 ounce brown rice credits 1.0 oz eq grain). If the product is not listed in the FBG, additional crediting documentation is required.
- Processed foods that are not listed in the FBG must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting.
- A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be

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<p>printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).</p> <ul style="list-style-type: none"> • A complete CN label includes the following: CN logo, product name, ingredient statement and inspection legend. It is important to save actual CN labels from product packaging that include these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label. • Collect new product labels annually and update records when new products are purchased. More information about crediting documentation can be found on the NSLP Menu Planning webpage, under the Child Nutrition Labels and Product Formulation Statements heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs). 				
05/06/2019	645	406	Administrative Review	Boscobel Middle School
Comments				Created Date
<p>Pre-K Meal Pattern Any students not yet in kindergarten (5K) must be served meals using the Child and Adult Care Food Program (CACFP) meal pattern when they eat meals separately from any K-12 students. If pre-k students eat meals at the same time and in the same place as older students, then they may be served the K-5 or K-8 meal pattern under the co-mingling flexibility. More information regarding the updated CACFP meal pattern is available on the Infants and Preschool in NSLP and SBP webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).</p>				5/6/2019 3:44:07 PM
05/06/2019	644	404	Administrative Review	Boscobel Middle School
Comments				Created Date
<p>Salad Bar Signage</p> <ul style="list-style-type: none"> • Produce on a garden bar can credit toward the meal pattern each day that it is offered to students (e.g., if black beans are offered daily with a planned serving size of 1/8 cup, then 5/8 cup has been offered in total each week and meets the minimum 1/2 cup requirement of beans/peas). Even with garden bars, the menu planner must plan a specific portion size that he or she intends students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as 1/2 of the volume served. • Additional signage on a salad or garden bar can assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a Salad Bar Signage Template with pictures that can be posted on a salad or garden bar (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx). 				5/6/2019 3:43:29 PM

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05/06/2019	643	404	Administrative Review	Boscobel Middle School
Comments				Created Date
In-house Yield In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the School Food Authority's (SFAs) next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if the food service operation consistently gets higher or lower yields from a product than what is specified in the Food Buying Guide (FBG). Additionally, an in-house yield study may be used for food items or sizes that are not currently listed in the FBG (e.g., 175 count apples). In-house Yield Study Procedures are available on the Menu Planning website (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy).				5/6/2019 3:40:16 PM
05/06/2019	642	407	Administrative Review	Boscobel Middle School
Comments				Created Date
Cycle Menu Recommendation <ul style="list-style-type: none"> Using a cycle menu may ease the burden of menu planning once the cycle has been set and help ensure meal pattern requirements are met after a compliant cycle has been planned (if served as planned). Cycle menus may also aid in purchasing if production records are reviewed and analyzed to forecast meal counts based on historical data. When using a cycle menu, production records can be partially completed including menu items, crediting information, and serving sizes (potentially planned quantity). Photocopies can be made, or if production records are managed electronically, they can be printed and the remaining information can be completed during production and after meal service. 				5/6/2019 3:39:41 PM
05/06/2019	641	1411	Administrative Review	Boscobel Middle School
Comments				Created Date
Buy American Provision <ul style="list-style-type: none"> The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf. The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation. 				5/6/2019 3:18:00 PM

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- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
 - If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can accepted within an email.
 - The label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
 - Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
 - Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
 - The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- For domestic products without country of origin labeling (COOL), consider the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- More information on this new requirement can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

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04/18/2019	562	1007	Administrative Review	ALL
Comments				Created Date
Local Wellness Policy Updates SFAs must review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. This recommended annual review of the policy is separate from the required triennial assessment.				4/18/2019 11:29:01 AM
04/18/2019	561	1007	Administrative Review	ALL
Comments				Created Date
Local Wellness Policy Triennial Assessment Completion SFAs must assess the LWP every three years, at a minimum--this is referred to as the "triennial assessment." The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. It must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results and when it took place.				4/18/2019 11:28:43 AM
04/18/2019	560	1007	Administrative Review	ALL
Comments				Created Date
Local Wellness Policy Triennial Assessment Public Notification After completion of the triennial assessment, SFAs are required to inform and update the public about the results. SFAs must retain a copy of the assessment and documentation related to the public notification. The public notification may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.				4/18/2019 11:28:29 AM
04/18/2019	559	1007	Administrative Review	ALL
Comments				Created Date
Local Wellness Policy Resources Please refer to the USDA resources regarding the LWP (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf ; https://healthymeals.nal.usda.gov/school-wellness-resources). Additionally, WI Team Nutrition has several resources available, including a toolkit, a wellness policy builder, policy content checklist, and wellness policy report card which can be useful in updating policy content and completing the triennial assessment (http://dpi.wi.gov/school-nutrition/wellness-policy).				4/18/2019 11:28:16 AM

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04/18/2019	558	700	Administrative Review	ALL
Comments				Created Date
<p>Annual Financial Report</p> <ul style="list-style-type: none"> All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for non-program food compliance. The Annual Financial Report instructions are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf). Additional resources that can aid in proper allocations for the AFR can be found on the Financial Management webpage and include a time study tool, menu raw food costing tool, an AFR webcast, expenditure category reference sheet, and an allocation tool for purchased services, equipment, and other expenses (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial). These categories of the AFR that should be addressed when tracking revenues and expenditures include: <ul style="list-style-type: none"> Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other.” Only expenses for edible food items and beverages should be reported under “Food.” “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other.” Under “Purchased Services” report any time someone is paid for services provided, such as equipment repair and health inspections. Under “non-program foods,” report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here. When revenues are recorded from the federal reimbursement payments, make sure that the full reimbursement is based on the printed claim form and not what is actually deposited into the account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from the revenue should be reported as an NSLP a purchased service. Transfers made into Fund 50 from non-federal sources to cover bad debt should be allocated as operating transfers for NSLP. The SFA reported a bad debt transfer as a transfer in for non-program foods, which is not the proper allocation. The total revenues, expenditures, and balance reported on the AFR should match those reported for Fund 50 on the PI-1505 report. If discrepancies occur between these reports, they should be investigated and corrected. 				4/18/2019 11:26:25 AM
04/18/2019	557	709	Administrative Review	ALL
Comments				Created Date
<p>Non-Program Food Revenue</p> <ul style="list-style-type: none"> Non-program foods include: adult meals, a la carte, extra entrees, extra milk (for cold lunch or milk break), vended meals (meals sold to other agencies), catered meals, and 				4/18/2019 11:25:47 AM

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<p>food service-operated vending machines. The SFA's coffee bar items are considered non-program foods if Fund 50 is being used to purchase the food and supplies.</p> <ul style="list-style-type: none"> All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit. Non-program food costs and revenues must be separated from program food costs and revenues. Since non-program foods include adult meals and extra milk, these expenses and revenues must be separated from program foods. SFAs must, at minimum, annually assess their compliance with the USDA non-program food revenue requirements, which is done by completing the USDA Nonprogram Revenue Tool. The DPI Nonprogram Food Revenue Tool/Calculator located on the Financial Management website feeds into the USDA tool and aids in calculating prices of non-program foods and meeting the USDA non-program food regulation. 					
04/18/2019	556	323	Administrative Review	Boscobel Middle School	
Comments					
				Created Date	
<p>Meal Counting and Claiming Edit Checks</p> <p>The SFA has a reliable edit check process for ensuring meal counts submitted on claims are accurate and error-free, including utilization of the correct report from the software system. However, it does not appear that daily lunch counts are consistently compared to attendance adjusted eligible counts by free/reduced/paid category by school prior to claim submission, as is required by USDA in 7 CFR 210.8. The claim preparers should immediately begin conducting this attendance adjusted eligible edit check process for lunch counts by school monthly, at minimum. Such attendance adjusted eligible edit check reviews could also be conducted by school monthly for breakfast as well. Please reference the monthly edit check resource on the DPI Claiming website for more details and guidance (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming).</p>					4/18/2019 11:21:07 AM
04/18/2019	555	215	Administrative Review	ALL	
Comments					
				Created Date	
<p>Verification Completion</p> <p>The SFA sent out the final adverse action letters for verification on 1/3/19, which is past the 11/15/18 deadline. Please note that if a household does not respond or fails to provide adequate documentation after the required follow-up(s), verification is considered complete when the household is sent a notice of adverse action. Please reference page 113 of the Eligibility Manual (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).</p>					4/18/2019 11:04:25 AM
04/18/2019	554	100	Administrative Review	ALL	

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Community Eligibility Provision The SFA does not currently participate in the Community Eligibility Provision (CEP), but is nearly eligible district-wide based on available proxy data. The SFA should consider if CEP would be a beneficial, financially viable option for the district or school(s) within the district. It is recommended to review the CEP resources on the DPI website , including USDA Monthly Federal Reimbursement Estimator (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility). If the SFA wishes to apply for CEP, applications must be submitted between 5/1/19 and 6/30/19.					4/18/2019 10:59:18 AM
04/18/2019	553	305	Administrative Review	ALL	
Comments					Created Date
Unpaid Meal Charge Policy Distribution SFAs must distribute the unpaid meal charge policy in writing to all households at the start of each school year and to households transferring into the district during the school year. The food service director distributed the policy to all households in the October newsletter. Going forward, the policy should be distributed prior to the start of the school year. It is suggested to include the policy in an earlier newsletter, such as a back-to-school newsletter in August or early September.					4/18/2019 10:43:31 AM
04/18/2019	552	1201	Administrative Review	ALL	
Comments					Created Date
Professional Standards Hour Requirements As a reminder, there are specific annual training requirements for staff members depending on their roles and hours worked per week: <ul style="list-style-type: none"> • Directors: 12 hours • Managers: 10 hours • Other Full Time Staff (20 hours or more per week): 6 hours • Part Time Staff (under 20 hours per week): 4 hours • If hired January 1 or later, only half of the training hours are required during the first school year of employment. 					4/18/2019 10:39:14 AM
04/18/2019	551	305	Administrative Review	ALL	
Comments					Created Date
Unpaid Meal Charge Policy Implementation The SFA's written unpaid meal charge policy is not implemented as it is written. The practices for handling negative balances are more lenient than what is stipulated in the written policy. The written policy and actual practices for negative balances should align and be consistent. It is highly recommended to revise the written policy so that it reflects actual practices.					4/18/2019 10:35:25 AM

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04/18/2019	550	305	Administrative Review	ALL	
Comments					Created Date
Unpaid Meal Charge Policy Alternative Meals The SFA's unpaid meal charge policy stipulates that alternative meals will be provided if specific criteria is met. The food service director stated that alternative meals have never been served in practice, but would be given free to students if served. If alternative meals will be served free of charge to students in the future, a tracking system must be in place. Fund 50 may not absorb this cost, therefore a non-federal fund transfer would be required to account for the costs of serving these meals.					4/18/2019 10:28:56 AM
04/18/2019	549	112	Administrative Review	ALL	
Comments					Created Date
Benefit Issuance List The benefit issuance list submitted as part of the review did not contain information regarding how student eligibilities were determined. The only lunch codes currently utilized are F for free and R for reduced. It is suggested to consider adding more specific lunch codes in the software system to further identify how a students' eligibility is determined. Ideally, benefit issuance lists would contain this information.					4/18/2019 10:20:13 AM
04/18/2019	548	1400	Administrative Review	ALL	
Comments					Created Date
Training for Student Helpers The student helpers that work in the kitchen have been trained on basic food safety practices and other topics necessary to fulfill their job duties. It is highly recommended to have the student helpers read and sign the employee health reporting agreement form to ensure illness reporting requirements are understood. While these student helpers are not subject to professional standards requirements, it is also recommended to track the training provided to them.					4/18/2019 10:16:46 AM
04/18/2019	547	2	Administrative Review	Boscobel Elementary School	
Comments					Created Date
WSDMP Agreement Per the agreement for the WSDMP, the SFA agrees to serve milk that is Wisconsin produced. This means that all or part of the raw milk used by the processor must be produced in Wisconsin. It is recommended check with the milk distributor for verification that the milk purchased is indeed all or partially Wisconsin produced. This stipulation can also be included in the milk bid.					4/18/2019 10:12:48 AM

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Comments				Created Date
<p>Special Dietary Needs Within Meal Pattern SFAs may make food substitutions, at their discretion, without a signed medical statement from a licensed medical practitioner as long as the meal pattern requirements are still met. It is highly recommended that the SFA have a completed medical statement on file from a medical authority to support the request. These accommodations must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of requests to ensure equitable accommodations.</p>				4/18/2019 10:09:03 AM
04/18/2019	545	805	Administrative Review	ALL
Comments				Created Date
<p>Special Dietary Needs Outside Meal Pattern All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the prototype Medical Statement for Special Dietary Needs posted on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the DPI School Nutrition Team website (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs).</p>				4/18/2019 10:06:54 AM
04/18/2019	544	201	Administrative Review	ALL
Comments				Created Date
<p>Verifying Official The verified applications did not contain the verifying official's signature and date of completion. The verifying official should sign and date the back of the verified applications when verification is complete to certify completion of the process.</p>				4/18/2019 10:04:02 AM
04/18/2019	543	1400	Administrative Review	ALL
Comments				Created Date
<p>Elementary School Food Safety Plan While the elementary school (EL) was not the review site, several topics were discussed that pertain to the EL. Field trip meals and breakfast in the classroom are offered at the EL. Standard operating procedures (SOPs) for these types of meal service should be included in the EL's food safety plan. It is recommended to develop SOPs for these meals service models and add them to the EL food safety plan.</p>				4/18/2019 10:00:42 AM

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04/18/2019	542	101	Administrative Review	ALL
Comments				Created Date
<p>Determining Official Designation The SFA has two determining officials that work together to approve meal applications and manage benefit issuance. Only one of these officials is designated on the online contract. In future school year, please list all determining officials on the contract. On the contract, there is only one line for each information field for the determining official. The names will need to be entered on the same line and separated by a slash mark. Please note that only one email address may be listed.</p>				4/18/2019 9:56:53 AM
04/18/2019	541	806	Administrative Review	ALL
Comments				Created Date
<p>Civil Rights Training While all staff members that needed to complete civil rights training did complete the training, this training was not conducted until March/April 2019. This training must be provided annually and it is highly recommended to schedule it before the start of the school year. Having the training at this time can ensure staff are refreshed on civil right requirements before the school year starts back up.</p>				4/18/2019 9:51:21 AM