

Administrative Review Report

Granton Area School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/12/2023	05/03/2023
On-Site Review	05/03/2023	05/04/2023
Site Selection Worksheet	01/12/2023	01/31/2023
Entrance Conference	05/03/2023	05/03/2023
Exit Conference	05/04/2023	05/04/2023

Commendations:

Thank you to all staff at Granton Area School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director (FSD) and Authorized Representative for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR.

The Food Service Director and Kitchen Manager were very receptive to the reviewers' suggestions, and this was appreciated. The timely responses to communications and completion of the off-site portions of the review were much appreciated. All of the staff members interviewed during the review were welcoming and helpful. Thank you for serving healthy, nutritious meals to your students!

The kitchen at the review site was very clean and organized. It is clear that food safety and customer service are valued. The review site offers a nice variety of breakfast items including hot and cold entrees daily. The district offers a "second chance" breakfast for the older students, which is an excellent way to provide more students with breakfast. At lunch, the district offers a good variety of fruits and vegetables daily, which the students seem to enjoy. The cafeteria has appealing signage and seasonal decorations, which is a nice touch.

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Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/08/2023 02:10 PM</p>	<p>Finding: The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The SFA is not currently tracking the use of the SCA funds.</p> <p>Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.</p> <p>CORRECTIVE ACTION: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and describe the process that will be used to track how the funds are spent. Upload a copy of the document/spreadsheet being used to track SCA fund use going forward.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	705	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/12/2023 10:00 AM</p>	<p>Finding: The 2021-22 Annual Financial Report's (AFR) total revenues, total expenditures, and ending fund balance does not match the PI-1505 financial report for public schools.</p> <p>Additionally, the reported expenditures exceeded the reported revenues for non-program foods on the AFR. Non-program foods must be self-supporting and generate enough revenue to at least cover the full expense of providing those items. Non-program foods may not be supported by funds from reimbursable meals or have losses absorbed by the food service account. If non-program foods revenue is in the negative, non-federal funds must be transferred into the food service account to cover the deficit.</p> <p>Please revisit the non-program food allocations on the 21-22 AFR and make any necessary corrections. The non-program food revenue tool completed in winter/spring 2023 shows compliance with non-program food revenue requirements, so the negative revenue for non-program foods on the AFR is likely the result of errors in allocations.</p> <p>CORRECTIVE ACTION: Manually update the 2021-22 Annual Financial Report. Ensure the beginning fund balance, total revenues, total expenditures, and ending fund balance match the PI-1505 financial report for public schools. Please also ensure that non-program food allocations are accurate.</p> <p>Upload a copy of the updated report into SNACS. Once approved, the report will need to be updated in the Online Services portal. The DPI accountant will make any adjustments after December 31.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	<p>Flagged</p> <p>05/08/2023 02:40 PM</p>	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The food service director put in a good effort to have the tool completed, However, the tool submitted during the review was missing some of the required information. The top nonprogram foods section of the tool did not contain data for adult breakfast, adult lunch, extra lunch entrée, extra breakfast entrée, or the milk break for paid-eligible students that Fund 10 repays Fund 50 for.</p> <p>Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.</p> <p>CORRECTIVE ACTION: Prior to the on-site review, technical assistance (TA) was provided by the consultant via email to the food service director (FSD). During the on-site review, additional TA was provided on the tool. The consultant and the FSD worked together to get the tool corrected. The final corrected tool indicated compliance with the non-program food revenue requirements.</p> <p>To fully satisfy this corrective action item, the FSD should look over the corrected tool from the on-site visit to ensure understanding—the DPI corrected tool is available under Documents in SNACS. After review, please upload the corrected tool into SNACS.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>05/08/2023 02:07 PM</p>	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.</p> <p>CORRECTIVE ACTION: Provide a timeline for when a school meal program civil rights 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.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	805	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>05/11/2023 02:25 PM</p>	<p>Finding: The SFA is currently making special dietary accommodations for one student that must eat a gluten-free diet. The documentation on file to support this accommodation does not include the required signature from a state authorized medical authority. The document on file is a typed letter from a medical facility explaining the student's diagnosis and the basics of gluten-free diets. The typed signature on the letter is from an RN, which does not fulfill the requirement to have a signature from a state authorized medical authority.</p> <p>Per USDA memo SP 32-2015, a state recognized medical authority is a state licensed health care professional who is authorized to write medical prescriptions under state law. This could include a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner.</p> <p>Further, the medical statements supporting meal accommodations for students with disabilities must also identify:</p> <ol style="list-style-type: none"> 1. an explanation of how the child's physical or mental impairment restricts the child's diet, 2. the food(s) to be avoided, 3. the food(s) that must be substituted <p>Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.</p> <p>CORRECTIVE ACTION: Contact the household to obtain the necessary signature needed to support the meal accommodation. Please also ensure the signed</p>

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		<p>statement addresses the three points above very clearly, so that the SFA has sufficient guidance on what is needed for the meal accommodation. DPI has a template medical statement that can be used.</p> <p>To satisfy this corrective action, please submit a copy of the communication sent to the household regarding this request. If the household submits a signed medical statement by the corrective action due date for the review, please upload a copy of this statement into SNACS with the student's name redacted.</p> <p>The SFA should continue accommodating this student's special dietary needs while awaiting receipt of this additional information from the household.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/08/2023 02:41 PM</p>	<p>Finding: The SFA's current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). Specific language regarding policy leadership, public involvement, food/beverage marketing, nutrition education, nutrition promotion, physical activity, the triennial assessment, and updating/informing the public is lacking.</p> <p>The policy did contain some language on the required topics of school meals, foods sold outside of school meal programs, foods provided but not sold, and other school-based strategies for wellness. However, the language was not very specific. The policy must contain specific goals. It must mention the Healthy Hunger-Free Kids Act of 2010, as well as USDA Smart Snacks standards.</p> <p>Further, the SFA has several different board policies that mention different aspects of wellness. The "Healthy Lifestyles" appears to primarily serve as the SFA's local wellness policy. It is recommended that the SFA update this policy to contain all of the required policy content.</p> <p>Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.</p> <p>CORRECTIVE ACTION: Submit a detailed timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/08/2023 02:42 PM</p>	<p>Finding: The SFA has attempted to complete the triennial assessment of the Local Wellness Policy (LWP), but did not fully complete both the LWP Report Card and the WellSAT 3.0 to meet this requirement.</p> <p>In Section 1 of the assessment, an overall rating score was not filled in. The sections for "physical activity and education" and "other school-base wellness activities" were blank. While this is possible if the policy lacked content in these areas, the SFA should double check that these sections are completed and were not simply skipped in error.</p> <p>Additionally, the SFA did not share the results of the Local Wellness Policy (LWP) assessment with the public per 7 CFR 210.31.</p> <p>CORRECTIVE ACTION: Complete the missing parts of the Local Wellness Policy assessment and upload into SNACS. Once the SFA determines the assessment is fully completed, notify the public of the results of the LWP assessment and upload a copy of the documentation to support this or the appropriate web site URL linking to the assessment.</p>
Site Name		

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Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/08/2023 02:41 PM</p>	<p>Finding: The SFA offers field trip meals several times per year, but the district's school food safety plan does not contain a corresponding Standard Operating Procedure (SOP) for these meals. The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).</p> <p>CORRECTIVE ACTION: Update the food safety plan to include an SOP for field trip meals. A sample field trip meal SOP is available on the food safety webpage: https://dpi.wi.gov/school-nutrition/program-requirements/food-safety. Please modify this SOP to reflect your current operation. Upload copy of the site-specific SOP that will be incorporated into the food safety plan.</p>
Site Name	Granton Hi	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	402	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/04/2023 10:18 AM</p>	<p>Finding: During the day of on-site breakfast review, two of the cereal bowl pack varieties that were available as an entrée option credited as less than 1 oz eq grain. Per the Product Formulation Statements, the Kix Bowlpack (17g) credited as 0.5 oz eq grain, and the Malt-O-Meal Coco Roos (25g) credited as 0.75 oz eq grain. In order for a grain to be considered an item at breakfast, it must credit as at least 1 oz eq grain.</p> <p>DPI intervened prior to breakfast meal service to ensure minimum meal pattern requirements were met, and discussed the option of bundling two cereal bowl packs together. Since the two varieties were a substitution from the supplier and not typically ordered, the food service manager decided to pull both of these bowl packs from the line altogether and only offer the other varieties that credited appropriately.</p> <p>Corrective action: Submit a statement of understanding of the K-12 breakfast meal pattern. In this statement, explain how this error will be avoided in the future and detail who will be responsible for verifying crediting information for all menu items prior to meal service.</p>
Site Name	Granton Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/04/2023 09:47 AM</p>	<p>Finding: There were no planned serving sizes on the garden bar production records. Garden bar production records must meet the same criteria as production records used to record main line items. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p>Corrective Action: Submit updated garden bar production records with serving sizes for each menu item. Although not required, DPI's Salad Bar or Garden Bar Production Records may be used (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/garden-bar-production-record.xlsx).</p>
Site Name	Granton Hi	

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Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 05/08/2023 02:07 PM</p>	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location. The location of the posting is appropriate, but the report that was posted was from November 2022. The January 2023 inspection was the most recent and is the report that needs to be posted.</p> <p>CORRECTIVE ACTION: During the on-site visit, the most updated report was posted. No further action required.</p>
Site Name	Granton Hi	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 05/03/2023 02:10 PM</p>	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <ul style="list-style-type: none"> Mandarin Orange Segments - Product of China Pineapple Tidbits - Product of Indonesia <p>Corrective Action: Noncompliant product list forms for the non-domestic products were completed while on-site. No further corrective action required.</p>
Site Name	Granton Hi	
Form Name	Fresh Fruit and Vegetable Program - Day of Review (1903-1910)	
Question #	1910	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/04/2023 11:00 AM</p>	<p>Finding: FFVP schools need to have a FFVP Standard Operating Procedure (SOP) in their food safety plan.</p> <p>Corrective Action: A sample FFVP SOP is available on the food safety webpage: https://dpi.wi.gov/school-nutrition/program-requirements/food-safety. Please update this SOP to reflect your current operation and train staff on all applicable aspects of food safety. Submit a statement verifying that staff administering the FFVP understand the requirements outlined in the SOP, and include Granton's plan to ensure future compliance.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
05/12/2023	3622		Administrative Review		FSD			

Comments

Supply Chain Assistance Funds

[Supply Chain Assistance \(SCA\) Funds](#) are to be exclusively used to purchase unprocessed or minimally processed domestic food products served in the National School Lunch (NSLP), School Breakfast (SBP), and Afterschool Snack (ASP) Programs. The USDA [Allocation of Supply Chain Assistance Funds to Alleviate Supply Chain Disruptions in the School Meal Programs: Questions and Answers](#) includes detailed information on allowable ways to utilize these funds.

Created By

Created Date

5/12/2023 8:30:50 AM

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<p>SFAs are required to maintain documentation supporting food purchases that are allowable for SCA purposes (i.e. unprocessed or minimally processed domestic food products) and equal in amount received, consistent with the regular program recordkeeping requirements. These funds must be tracked as they are used. DPI has developed a Supply Chain Assistance (SCA) Funds Expense Tracker that SFAs may use to track these funds, however, SFAs may use any form of tracking. The school's vendor may be able to assist with this tracking process.</p>							
<p>SCA funds are recorded under WUFAR code 717 Revenue Source - federal reimbursement and 547 Program/Project Code - National School Lunch (NSL) . Record the entire amount into NSL revenue on the AFR during the year it is received and expense it to NSL "food" as it is used. The NSL food expense may carry over into future AFR reporting year.</p>							
05/12/2023	3620		Administrative Review		FSD		
Comments							
Non-Program Foods Revenue Tool				Created By		Created Date	
<p>Non-program foods include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, and food service operated vending machines. 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. This ensures non-program foods are not supported by reimbursable meals.</p> <p>SFAs are required to annually complete the DPI Non-program Food Revenue Tool or the USDA Non-program Food Revenue Tool. The DPI tool is recommended since it aids in calculating prices of nonprogram foods to ensure USDA revenue requirements are met as found in Non-program Foods Revenue Rule SP-20-2016 .</p> <p>Completing the tool in the spring each year can help the SFA make adjustments to the non-program food prices for the following school year to ensure compliance. A non-program foods deficit must receive a transfer of non-federal funds into the nonprofit food service account.</p> <p>The food service director (FSD) did a good job working on the tool. However, a few corrections were needed. Assistance with the tool was also provided prior to the on-site review via email. Please keep the following items in mind when completing the tool in the future:</p> <ul style="list-style-type: none"> In the bottom program foods section of the tool, fill in CEP Free and CEP Paid sections, if the SFA is not approved at a 100% free claiming percentage. For the 5 days of meal counts, you will need to apply your claiming percentage to determine how many meals are CEP free and how many are CEP Paid. This section of the tool is trying to capture your actual revenue from service of program foods, and for your CEP meals that will only come from the free and paid reimbursements you receive. In the top non-program foods section, this must include all non-program foods offered by the SFA. Adult meals and extra entrees must be included. Additionally, since the SFA offers the Wisconsin School Day Milk Program (WSDMP), there are milks served to paid eligible elementary students each day at milk break. The SFA allows these students to have the milk for free, the FSD keeps records of how many paid milks were served, and the FSD bills Fund 10 for this total cost annually. Fund 50 is then reimbursed for this. The FSD creates the invoice by multiplying the number of paid milks from the school year by the calculated average milk cost used on the WSDMP claim. This price per milk charged to Fund 10 is lower than the a la carte milk price. These paid milk break milks should be included on their own line in the non-program food section of the tool to get the full picture of non-program food revenue compliance. <p>There is a menu raw food costing tool available in the "Budgeting and Cost Control" section of the Financial Management webpage. This can assist in determining the raw food costs for reimbursable meals needed to complete the non-program food revenue tool.</p>						5/12/2023 8:25:18 AM	
05/11/2023	3619		Administrative Review		AR		
Comments							
WUFAR Coding				Created By		Created Date	
<p>For public schools in Wisconsin, all food/beverage purchases and revenue from the sale of foods/beverages must be coded to Fund 50 per Wisconsin Uniform Financial Accounting Requirements (WUFAR).</p> <p>The WUFAR provides for the recording of all financial transactions inherent in the management of Wisconsin's public school systems to administer the state's school aid programs. School district officers and employees are required to maintain this uniform recording of accounting per Wis. Stats. § 115.30(1). The WUFAR can also be used to meet part of the financial management requirements of 2 CFR 200.302 related to federal grant programs.</p>						5/11/2023 3:23:11 PM	

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Beyond these purposes, the WUFAR is also used to promote uniformity important for the facilitation of financial accounting, reporting, data processing, auditing, and inter-district comparisons. A uniform accounting system eases the transition for personnel moving from one district to another. The account code hierarchy of the WUFAR is designed to balance the need for uniformity with the flexibility needed to suit local needs by allowing the use of more detailed local optional coding. The WUFAR is designed to be used in large, medium, or small districts; in rural, suburban, or urban settings; in common, unified, or first class city school districts; and in districts with different kinds of accounting equipment, software or procedures.								
Financial administration requires that each transaction be identified for administrative and accounting purposes. The first identification is by "fund" which is an independent fiscal and accounting entity, requiring its own set of books, in accordance with special regulations, restrictions, and limitations that earmark each fund for a specific activity or for attaining certain objectives. Each fund must be so accounted for that the identity of its resources and obligations and its revenues and expenditures is continually maintained. All funds used by Wisconsin school districts must be classified into one of nine "fund types". The major fund types are:								
<ul style="list-style-type: none"> • The General Fund (10), • Special Revenue Fund (20), • Debt Service Fund (30), • Capital Projects Fund (40), • Food Service Fund (50), • Custodial Fund (60), • Trust Fund (70), • Community Service Fund (80), and • Package and Cooperative Program Fund (90). 								
Wisconsin school districts may not need all of these fund groups at any given time. The General, Special Revenue, Debt Service, and Food Service will undoubtedly encompass the majority of the transactional activity that will occur in the school district. The remaining fund groups, however, are still material to the overall presentation of the financial position of the school district and as such should be maintained and reported accordingly.								
There is a resource on the DPI SNT Financial Management webpage with standard WUFAR codes for Fund 50 which may be useful.								
05/11/2023	3618		Administrative Review		AR			
Comments								
Alternate Household Income Forms					Created By	Created Date		
When an SFA participates in CEP SFA-wide, they may use the Alternate Household Income Form as a way to collect socioeconomic data from students in CEP schools. This application has been designed to be easy to complete, which assists in increasing the response rate from households. The purpose of this application is to collect data for Title 1, SAGE (AGR), etc. The processing of these applications cannot be paid for with food service funds, since this data is not needed for meal eligibility purposes.								
If the SFA no longer participated in CEP in the future, then household applications for free/reduced-price meal benefits would be needed for meal eligibility purposes. In this scenario, Fund 50 would be able to cover the labor costs of processing these forms.						5/11/2023 3:06:38 PM		
These same principles apply when considering student eligibility in the Wisconsin School Day Milk Program (WSDMP). If the SFA is in CEP, the cost of processing applications for WSDMP cannot be covered by Fund 50 since this is a state program. If the SFA is not in CEP and needs to collect meal applications for the USDA Child Nutrition Programs, then the labor cost for processing applications can be billed to Fund 50 and that data would also be used to establish WSDMP eligibility.								
05/11/2023	3617		Administrative Review		FSD			
Comments								
Complete Meals					Created By	Created Date		
During lunch observation, there was a small point of confusion with the cashier understanding the minimum number of meal items to be selected to create a reimbursable meal (specifically if a student just selected mini corn dogs and a fruit/vegetable). It is suggested to have a training, or perhaps a short daily "stand up meeting," of what makes up a meal for the day to ensure staff all understand what students could select that day under Offer vs Serve to make a complete meal.						5/11/2023 2:56:25 PM		
05/11/2023	3616		Administrative Review		FSD			

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Comments							
And Justice for All Poster				Created By	Created Date		
During the on-site visit, it was noted that the correct And Justice for All Poster was displayed in an appropriate location. Next to it was an outdated poster from several years ago. The old poster was removed and discarded during the visit so only the most updated poster is displayed.					5/11/2023 2:52:02 PM		
05/11/2023	3615		Administrative Review	FSD			
Comments							
Local Wellness Policy				Created By	Created Date		
<p>SFAs are required to retain basic records demonstrating compliance with local wellness policy (LWP) requirements. For assistance in the creation and updates of a LWP, Wisconsin Team Nutrition has several wellness policy resources available. A summarized "In a Nutshell" resource, policy content checklist, a wellness policy builder, and wellness policy report card found on the LWP webpage. The policy builder contains a variety of sample language that SFAs can adopt and modify to suit their needs instead of needing to come up with language from scratch.</p> <p>The SFA must review and update the local school wellness policy (LWP) on a periodic basis. The frequency of updates is a local decision and is based on the content and structure of the plan (7 CFR 210.31).</p> <p>SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. The SFA must permit parents, students, physical education teachers, school health professionals, school administrators, school board members, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. The SFA must retain documentation on stakeholders invited to participate in the committee, their relationship to the SFA, and those who participated in the review and update of the LWP (7 CFR 210.31). SFAs are encouraged to notify key stakeholders through various methods of communication (7 CFR 210.31). Suggestions for including a variety of stakeholders include:</p> <ul style="list-style-type: none"> • sending a letter to parents/families; • providing status updates in teacher/staff trainings; • posting a call for volunteers on the school website; • including a blurb on the school, SFA, or local community newspaper, newsletter, and/or blog; • partnering with community organizations to spread the information; and • posting information about the process on social media. <p>SFAs must inform the public each school year of basic information about the local school wellness policy, including its content and any updates as described in 7 CFR 210.31(d)(2). The SFA must inform the public about the content, implementation of, and updates to the Local Wellness Policy (LWP) on an annual basis. SFAs may use a variety of methods to notify the public about the LWP. This may include mailing flyers, newsletters, emails, newspaper articles. The SFA must retain documentation regarding the notification (7 CFR 210.31).</p> <p>An assessment of the Local Wellness Policy (LWP) must be conducted once every three years, with the first assessment completed no later than June 30, 2021. It requires SFAs to describe how the language in the SFA's LWP compares to the model LWP, measure the SFA's compliance with its LWP, and describe the SFA's progress toward meeting its LWP goals.</p> <p>SFAs must use the Wisconsin Local Wellness Policy Triennial Assessment Report Card in order to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two. The SFA is required to inform and update the public about triennial assessment. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public including: mailing flyers, newsletters, emails, website postings, and newspaper articles.</p>					5/11/2023 2:46:47 PM		
05/11/2023	3614		Administrative Review	FSD			
Comments							
Field Trip Meals				Created By	Created Date		
The SFA occasionally offers meals for field trips. It is great that the school offers field trip meals! The SFA must ensure that proper point of service (POS) procedures are used on the field trips. A school staff member on the field trip should use a CEP tally sheet to record when students select their reimbursable meal at lunch time on the field trip. The tallying should be completed on the field trip when the meals are handed out. This completed					5/11/2023 2:39:09 PM		

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sheet should be returned to the food service director for use in compiling the claim for reimbursement. Meal counts for field trip meals should not simply be based on how many bagged meals were sent on the trip or which students pre-ordered them—the meal counts must be based on how many students actually received a reimbursable lunch on the field trip.					
Please refer the field trip meals section of the Menu Planning webpage .					
05/11/2023	3613	Administrative Review		FSD	
Comments					
Records Retention				Created By	Created Date
<p>All program records related to the school nutrition programs must be kept for a period of three years after submission of the final claim for reimbursement for the fiscal year. If audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit issues. Refer to 7 CFR 210.23 (c) and 7 CFR 210.15 (b). This includes free, reduced-price, and denied applications, DC documents, and verification documents.</p> <p>Proper records retention is a crucial step in showing that the SFA is meeting program requirements.</p> <p>Other examples of program records that must be kept for three years plus the current year are:</p> <ul style="list-style-type: none"> • Claims for Reimbursement (including supporting documentation, such as point-of-service benefit issuance rosters); • Meal count participation data by school; • Documentation of edit checks, on-site reviews, internal controls, October enrollment, free and reduced price eligible data; • If applicable, currently approved and denied certification documentation for free and reduced price lunches and a description of the verification activities, • Records to demonstrate the school food authority's compliance with the professional standards for school nutrition program directors, managers and personnel established • Agreements and free and reduced price policy statements; • Approved and denied free and reduced price meal applications; • Procedures and documentation for direct certification for free meals, if applicable; • Procedures for alternate point-of-service meal counts, if applicable; • Menu and food production records and, if applicable, nutrient analysis records; • All documentation provided in support of the Resource Management Section (including appropriate records to document compliance with the paid lunch equity and revenue from nonprogram foods requirements); • Documentation associated with the local school wellness policy; • Number of food safety inspections obtained per school year by each school; • Records from the food safety program for a period of 6 months following a month's temperature records. If temperature records are on production records, then keep for 3 years plus current year • Records from the most recent food safety inspection; • Documents demonstrating compliance with Civil Rights requirements; • Audit reports and written responses and any related corrective action. <p>Additional record retention rules apply for CEP schools. These are detailed in 7 CFR 245.9 and the USDA CEP Planning and Implementation Guidance. The records listed below must be kept as long as the SFA is in CEP (including any extensions), plus three fiscal years after the submission of the last Claim for Reimbursement which was based on the data. In any case, if audit findings have not been resolved, these records must be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit.</p> <ul style="list-style-type: none"> • Data used to calculate the identified student percentage (which is usually primarily direct certification data) • Annual selection of the identified student percentage <ul style="list-style-type: none"> ◦ CEP applications, annual CEP intent forms, eligibility worksheets submitted with CEP applications ◦ CEP approval packets sent by DPI after application is submitted and approved • Total number of breakfasts and lunches served daily • Free and paid claiming percentages used to claim meal reimbursement • Non-Federal funding sources used to cover any excess meal costs • School-level information provided to the State agency for publication 					5/11/2023 2:36:57 PM
05/11/2023	3612	Administrative Review		AR	
Comments					
Hiring Standards for New Food Service Directors				Created By	Created Date
Each SFA must designate one staff member as the "Food Service Director" (FSD). The Food Service Director performs and/or oversees areas such as food safety, nutrition and					5/11/2023 2:33:36 PM

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menu planning, food production, procurement, financial management, customer service, and day-to-day program management.					
The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the NSLP and SBP, with further flexibilities for directors hired after April 29, 2019, in SFAs with under 2500 enrollment. SFA's with less than 500 students also have additional flexibilities.					
The Hiring Standards for new SFA directors are based on the size of the SFA and includes education, school nutrition and/or relevant food service or school nutrition experience, and food safety training. These requirements are listed in a summary document called " In a Nutshell- Hiring Requirements ".					
Per SP 38-2016, SFAs may not use the nonprofit school food service account to pay the salary of a new school nutrition program director (hired on or after July 1, 2015) who does not meet the hiring standards.					
Additional resources may be found on the Professional Standards webpage, including a helpful USDA Q&A resource which is recommended to review.					
If the SFA will designate a new food service director in the future, they must review these standards to ensure the new director meets the requirements. Please contact a DPI Nutrition Program Consultant with any further questions on this topic.					
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Comments					
Food Safety Plans		Created By		Created Date	
SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles. This requirement covers any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition Programs.				5/11/2023 2:30:41 PM	
Food safety programs should contain Standard Operating Procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.					
Schools must have a comprehensive, site-specific food safety plan which includes HACCP process 1, 2, and 3 items, SOPs, equipment list, and food service staff list. The food safety plan must be reviewed annually. All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan.					
Please remember that a food safety plan is a working document. This means it should be updated as procedures change in response to menu modifications, new equipment, or other operational changes. Staff members and other food handlers should be held accountable for the procedures outlined in the site-specific food safety plan. Modifications should be made for each serving site based on the specific school's procedures. Any SOPs that do not apply to the school site should be omitted from the school's food safety plan. Further, any additional SOPs that are relevant to the school's procedures should be developed and added to the food safety plan.					
05/11/2023	3610	Administrative Review		FSD	
Comments					
Special Dietary Needs		Created By		Created Date	
Special Dietary Needs - The USDA requires that schools participating in the National School Lunch Program and accepting federal dollars must accommodate all special dietary requests signed by a state authorized medical authority, written in an IEP and/or a 504 plan.				5/11/2023 2:29:00 PM	
Policy Requirements - At a minimum School Food Authorities (SFAs) participating in the USDA Child Nutrition Programs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend districts develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination. The School Nutrition Team has created a Special Dietary Needs Policy template which can be modified to fit the needs of the SFA. If the district already has a policy in place, it is recommended to compare this policy to ensure your policy includes all important information.					
Medical Statement - It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website . This template is available in English, Spanish, and Hmong. At a minimum the statement must include: 1. An explanation of how the child's physical or mental impairment restricts the child's diet 2. The food(s) to be avoided 3. The food or choice of foods that must be substituted					

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<p>4. The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI. This will be a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner.</p> <p>A signed medical statement from a state authorized medical authority does not need to meet meal pattern requirements provided the statement supports food substitutions made outside of the meal pattern requirements.</p> <p>SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or fall within Offer vs. Serve for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance. A signed medical statement is not needed in order to provide low fat or fat-free lactose-free milk, since this is an allowable milk type and thus does meet the meal pattern requirements.</p> <p>Brand Names - In some situations, a state authorized medical may request a particular brand name of a product as a substitute on the medical statement. Generally, SFAs are not required to provide the specific brand requested, unless the brand name item is medically necessary. Instead, the SFA must provide a reasonable modification that accommodates the child's disability and provides equal opportunity for the child to participate in and benefit from the Program. In situations where the requested substitute is very expensive or difficult to procure or obtain, it would be reasonable for the SFAs to follow up with the family to see if a different substitute would be safe and appropriate for the child.</p> <p>For example, a medical statement for a child with gluten intolerance may request a specific brand of gluten-free bread. If a modification request indicates a brand name item, in most instances, a generic brand is sufficient, unless the brand name item is medically necessary. This can be determined through the interactive process with the child's parent or guardian. In the example above, if the medical statement lists a specific brand of gluten-free bread, the SFA could check with the family to see if it would be safe and appropriate for the SFA to provide a different brand. In this instance, the family could then affirm the brand name change.</p> <p>Timing of Medical Statements - Sometimes, SFAs receive a meal modification request outside the regular meal pattern before a child's parent or guardian is able to submit the required medical statement. If the SFA is aware a meal modification is needed, the SFA may not unduly delay providing the modification while awaiting the medical statement. Instead, the SFA should begin providing a reasonable modification to keep the child safe, and request the family provide a medical statement signed by a state authorized medical to support the meal modification as soon as possible. In this situation, school officials must document the initial interaction with the family where school officials first learned of the child's need for a modification. School officials should follow up with the family if the school does not receive the requested medical statement as anticipated and maintain a record of this contact. Schools should continue to follow up until the family submits a medical statement supporting the need for a modification.</p> <p>When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals. Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent or guardian for guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information.</p> <p>Resources - The Special Dietary Needs Flowchart outlines the process of accommodation determination. The USDA Q&A on Accommodating Special Dietary Needs resource, the USDA Special Dietary Needs Handbook, and Q&As: Milk Substitution for Children with Medical or Special Dietary Needs (Non-Disability) contain additional detailed information</p>							
05/11/2023	3609		Administrative Review		FSD		
Comments							
On-Site Monitoring				Created By		Created Date	
On-site monitoring is only required for SFAs with more than one serving location. Granton Area School District has just one kitchen/serving location even though it is technically two schools for educational purposes. Because there is a single serving site, annual completion of the on-site monitoring forms is not required. The school may use the on-site monitoring forms if desired, however this is not a requirement.						5/11/2023 2:27:38 PM	
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Civil Rights Training and Complaint Procedures				Created By	Created Date			
<p>Civil Rights Training: Civil rights training, such as the Civil Rights webcast, must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program including non-foodservice staff. Each SFA must maintain documentation of the training and an attendance record of participants that attended. The SFA should make sure to retain a copy of the presentation that is used each year for the training, in addition to the sign-in sheet for the training. These documents are needed to show that the requirements were met and that the training contained the necessary components.</p> <p>Civil Rights Complaint Procedures: 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.</p> <p>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 Template Civil Rights Complaint Procedures to create written procedures.</p> <p>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.</p> <p>If a complaint of discrimination is received at your district, the following procedures should be followed:</p> <ol style="list-style-type: none"> 1. Document the complaint using the USDA Program Discrimination Complaint Form. 2. Submit complaints within five days of receiving the complaint to: <ul style="list-style-type: none"> • Wisconsin Department of Public Instruction (DPI) <ul style="list-style-type: none"> ○ Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 ○ Fax: (608) 267-0363 ○ Email: jessica.sharkus@dpi.wi.gov 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 with a legitimate need-to-know. 								5/11/2023 2:27:05 PM
05/04/2023	3562		Administrative Review		FSD			
Comments								
Weight vs. Volume Measurements				Created By	Created Date			
<p>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. 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.</p>								5/4/2023 10:08:11 AM
05/04/2023	3561	431	Administrative Review	Granton Hi	FSD			
Comments								
Production Records				Created By	Created Date			
<p>Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Technical assistance was given on-site on using volume measures to record portion sizes of fruits and vegetables, and using weight measures to record portion sizes of M/MA and grains. Continue to work with staff on recording menu item names with descriptions and/or product numbers, serving size for all menu items, and any substitutions made to the planned menu or for students with special dietary needs. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.</p>								5/4/2023 10:01:15 AM
05/04/2023	3560	435	Administrative Review	Granton Hi	FSD			
Comments								
Standardized Recipes				Created By	Created Date			
<p>Technical assistance was provided on-site on the recipe standardization process. The recipe for the alternate entrée sub sandwich should be updated to reflect current products that are used, and separate recipes should be written for each sub variety to accurately reflect the different crediting provided by each sandwich. Recipe standardization ensures that each meal is consistently planned to meet the daily and weekly requirements. For more information on what essential information must be on a standardized recipe, review the Standardized Recipes in a Nutshell document (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipes-in-a-nutshell.pdf).</p>								5/4/2023 9:59:48 AM

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Comments									
Crediting Documentation						Created By	Created Date		
<p>Nutrition Facts labels, Child Nutrition (CN) labels, and/or Product Formulation Statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted. Continue to work on updating and keeping record of all crediting documents for products served as part of a reimbursable meal.</p>							5/4/2023 9:58:31 AM		