Prairie du Chien Area School District

Review Schedule:

| Schedule Type | Start Date | End Date |
|--------------------------|------------|------------|
| Off-Site Review | 12/21/2023 | 03/25/2024 |
| On-Site Review | 03/27/2024 | 03/28/2024 |
| Site Selection Worksheet | 12/21/2023 | 12/28/2023 |
| Entrance Conference | 03/27/2024 | 03/27/2024 |
| Exit Conference | 04/5/2024 | 04/5/2024 |

Commendations:

Thank you to the school staff members for being welcoming during the review. Thank you for being available throughout the on-site visit to answer questions and retrieve documentation requested. We appreciate all staff's cooperation, honesty, and willingness to listen to constructive criticism and feedback.

Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT will offer School Nutrition Summer Training online and in person. Find more information on these training opportunities on the DPI School Nutrition Training Webpage.

It is recommended that school staff seek out opportunities for additional training on the student information system. It seems like staff would greatly benefit from learning more about the features and codes in the system. It may also be a good idea to talk to other schools that use the same software to see if there are any tips to share on using the food service module. This may also help with finding ways to streamline the school nutrition processes.

Prairie du Chien Area School District

Findings and Corrective Action:

| Form Name | Maintenance of Non-Profit School Food Service Account (700 - 705, 777) | |
|--|---|--|
| Question # | 700 | |
| Corrective Action History | Finding: On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). Corrective Action 1: Review the Annual Financial Report Webcast and upload the certificate of completion. Corrective Action 2: Utilizing the Annual Financial Report Template notate the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS or email to Nutrition Program Consultant. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system. | |
| Form Name | Naintenance of Non-Profit School Food Service Account (700 - 705, 777) | |
| Question # | 777 | |
| Corrective Action History | Finding: The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed to receive the funds. The SFA is not aware of what the funds can be spent on, the funds are used on unallowable costs and/or the funds are not being tracked separately. Corrective Action: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent. | |
| Form Name | Civil Rights (800 - 807) | |
| | 803 | |
| Question # | 303 | |
| Question # Corrective Action History | Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). Corrective Action: Utilizing the DPI template policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA and upload into SNACS. | |
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| Corrective Action History Form Name | Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). Corrective Action: Utilizing the DPI template policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA and upload into SNACS. Civil Rights (800 - 807) | |
| Corrective Action History Form Name Question # Corrective Action History | Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). Corrective Action: Utilizing the DPI template policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA and upload into SNACS. Civil Rights (800 - 807) Finding: The SFA does not have written procedures in place to notify households how to request a meal modification for students with special dietary needs. Corrective Action: Provide a timeline for when a Special Dietary Needs procedure will be put in place. Provide the name and title of the SFA representative that will ensure compliance. It is recommended that SFAs utilize the Special Dietary Needs policy template. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special- | |

| Corrective Action History Form Name | Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31. Corrective Action: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action. The form is located here: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/1441-civil-rights-compliance-self-evaluation.doc Local School Wellness (1000 - 1006) | |
|-------------------------------------|---|--|
| Question # | 1000 | |
| Corrective Action History | Finding: Current Local Wellness Policy (LWP) does not include all of the required contentand is missing policy leadership, public involvement, school meals, foods sold outside of the school meal programs, foods provided but not sold, food and beverage marketing, nutrition promotion, triennial assessment, update/inform the public and the full nondiscrimination statement (7 CFR 210.31). Corrective Action: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | |
| Form Name | Local School Wellness (1000 - 1006) | |
| Question # | 1002 | |
| Corrective Action History | Finding: The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) is/will be reviewed and updated. Corrective Action: Provide a plan on when and how the LWP will be reviewed and updated. | |
| Form Name | Local School Wellness (1000 - 1006) | |
| Question # | 1004 | |
| Corrective Action History | Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee. Corrective Action: Provide a plan on how potential stakeholders will be notified of their ability to participate. | |
| Form Name | Local School Wellness (1000 - 1006) | |
| Question # | 1005 | |
| Corrective Action History | Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years. Corrective Action: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website. | |
| Form Name | Certification and Benefit Issuance (124 - 142) | |
| Question # | 126 | |
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| Corrective Action History | Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected. 253 free and reduced price meal application determinations were reviewed, 26 errors were identified. This is a 10.28% BI error, fiscal action will be assessed for errors over 3%. Corrective Action: Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS. |
|------------------------------|---|
| Form Name | Certification and Benefit Issuance (124 - 142) |
| Question # | 134 |
| Corrective Action History | Finding: The SFA did not perform Direct Certification (DC) in the required timeframes. Full Enrollment DC runs must be performed at least 3 times each school year: at or around the beginning of the school year, 3 months after the initial match and again 6 months after the initial match (7 CFR 245.6). Corrective Action: Run direct certification ASAP. Provide a statement of how and when the SFA will perform the full enrollment DC runs in the required time frames during the school year as well as who will be responsible for this task. |
| Form Name | Certification and Benefit Issuance (124 - 142) |
| Question # | 138 |
| Corrective Action History | Finding: The Benefit Issuance (BI) list did not accurately discontinue meal eligibility benefits for students that did not qualify after the 30-day carryover. Corrective Action 1: Notify the household(s) of the reduction in benefits and upload a copy of the adverse action letter into SNACS. Corrective Action 2: Provide documentation that shows the BI list and POS have been updated with the correct eligibility 10 days after the notification is sent. |
| Form Name | Verification (207 - 215) |
| Question # | 207 |
| Corrective Action History | Finding: SFA did not complete the verification process per 7 CFR 245.2. Corrective Action 1: Send the "We Have Checked" letters to the households chosen for verification and change the student status 10 days after the letter is postmarked to the household. Corrective Action 2: Submit a statement of understanding that verification must be completed annually by November 15. |
| Form Name | Verification (207 - 215) |
| | |

| Corrective Action History Form Name Question # | Finding: SFA did not complete a confirmation review before verifying application(s). Corrective Action: Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification. Verification (207 - 215) 212 Finding: The SFA did not provide documentation to support that they met the follow-up requirements when a household failed to respond to the request for verification (7 CFR 245.6a). |
|---|--|
| Corrective Action History | Corrective Action: Submit a statement of understanding that the SFA's verifying official must follow up with the household at least once before the verification process is complete. |
| Form Name | Verification (207 - 215) |
| Question # | 215 |
| Corrective Action History | Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a). Due to ongoing noncompliance with verification, the state agency will require all documentation for verification to be submitted for the 2024-2025 school year. Corrective Action: Watch the The Verification Process and the Verification Collection Report (Part 2) webcast, upload the certificate of completion into SNACS and provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame. |
| Form Name | Meal Counting and Claiming (314 - 316) |
| Question # | 314 |
| Corrective Action History | Finding: It was observed that field trip meals and meals provided to students who have been suspended and attending school in a different building are being counted before the students took the meal. Meals must be counted at the point of service (POS) where it can be accurately determined that a reimbursable meal has been served. Some meal count systems that are not acceptable include: • Attendance/classroom meal counts - meal counts prior to meal service are important for production purposes but do not provide an accurate count of meals served. • Tray or entrée counts - tray or entrée counts do not ensure all required components were on the tray, trays were not stuck together, or that each entrée was part of a reimbursable meal. • Backout counts - Counting the number of leftover meals from the starting meal count do not account for dropped trays, or that each entrée was part of a reimbursable meal. |

| | Corrective Action: Provide a statement of how this point of service will be corrected so that it accurately counts the meal as the meal is being served to the student. |
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| Form Name | Civil Rights (809 - 810) |
| Question # | 810 |
| Corrective Action History | Finding: The non-discrimination statement was not included on all required program materials and was missing on the school website and the localwellness policy. Corrective Action: Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS or provide website address. |
| Form Name | Professional Standards (1210 - 1219) |
| Question # | 1214 |
| Corrective Action History | Finding: The Food Service Director did not complete the 12 hours of annual continuing education/training for the current school year and was unable to provide a training plan on how this will be met (7 CFR 210.30). Corrective Action: Provide a training plan for how the 12 hours of continuing education/training will be met for the current school year. |
| Form Name | Professional Standards (1210 - 1219) |
| Question # | 1216 |
| Corrective Action History | Finding: The SFA did not provide sufficient documentation to show that school nutrition program staff completed the required training hours for the current school year and was unable to provide a training plan for the current school year (7 CFR 210.30). Corrective Action 1: Complete the Professional Standards e-learning course and upload the certificate of completion. Corrective Action 2: Review annual training requirements for school food service staff (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf). Provide a training plan for how each food service staff member that is not in compliance will meet the required training hours for the current school year. |
| Form Name | Professional Standards (1210 - 1219) |
| Question # | 1217 |
| Corrective Action History | Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. Corrective Action: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS. |
| Form Name | Professional Standards (1210 - 1219) |
| Question # | 1219 |
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| Corrective Action History | Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year, specifically the "substitute" point of service staff and the district bookkeeper responsible for the Annual Financial Report (7 CFR 210.30). Corrective Action: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities. This must include a minimum of civil rights training and training related to job duties. |
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| Form Name | Reporting and Recordkeeping (1500 - 1501) |
| Question # | 1501 |
| Corrective Action History | Finding: The SFA is not maintaining program records and documentation for three years plus the current school year to meet record retention requirements (7 CFR 210.23(c)), 4 free and reduce price meal applications requested could not be found. Corrective Action: Provide a statement of how the record retention requirements will be met moving forward. |
| Site Name | Prairie du Chien Hi |
| Form Name | Meal Counting and Claiming - Review Period (322-325) |
| Question # | 325 |
| Corrective Action History | Finding: The SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Meal counts included ineligible meals for a site not eligible for reimbursement. Due to this being a systemic issue, fiscal action will be pursued by the state agency and all ineligible meals provided to this site will be reclaimed following record retention guidelines. Corrective Action: (Systemic) - Upload monthly edit checksfor breakfast and lunch for September of 2020 through January of 2024 into SNACS. |
| Site Name | Prairie du Chien Hi |
| Form Name | Meal Components and Quantities - Day of Review (400-408) |
| Question # | 401 |
| Corrective Action History | Finding: One non-reimbursable meal was observed at Prairie du Chien High School during lunch meal service on Wednesday, March 27, 2024. The meal did not contain three full components, required under Offer versus Serve (OVS). One student selected waffle fries (1/2 cup), baked beans (1/2 cup), prepackaged apple slices (2 ounces by weight, 3/8 cup), and milk (1 cup). Three non-reimbursable meals were observed at Prairie du Chien High School during breakfast meal service on Thursday, March 28, 2024. The meals did not contain three food items and/or 1/2 cup fruit, vegetable, or combination, required under OVS. • One student selected Pop Tarts (s'mores, 1.25 oz eq) and mandarin oranges (1/2 cup); |

| | One student selected Pop Tarts (blueberry, 1 oz eq), cereal (1 oz eq), and milk (1 cup); and One student selected a string cheese (1 oz eq) and juice (1/2 cup). Corrective Action: Submit a statement of understanding that students must select: Three full components at lunch, including 1/2 cup fruit, vegetable, or combination under OVS, and Three food items at breakfast, including 1 /2 cup fruit, vegetable, or combination under OVS. Explain how these errors will be corrected and avoided in the future. |
|------------------------------|---|
| Site Name | Prairie du Chien Hi |
| | Meal Components and Quantities - Day of Review (400-408) |
| | 404 |
| Corrective Action History | Finding: Signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/signage). Prairie du Chien High School offers a self-serve salad bar. Tongs were used as the serving utensil for all foods, except canned fruit. Without signage or proper portioning utensils (e.g. spoodles), students are unable to determine how much to select to meet the 1/2 cup requirement under Offer versus Serve. Salad bar signage templates are available on the Signage webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx). In-house yield studies are an ideal way to determine quantities to complete the signage. Corrective Action: Submit photos of completed signage posted near the lunch and breakfast service line as well as on the salad bar. |
| | Prairie du Chien Hi |
| | Meal Components and Quantities - Review Period (409-412, 430-437) |
| Question # | 410 |
| Corrective Action History | Finding 1: The daily and weekly minimum requirements for fruit were not met for the 9/12 age/grade group for lunch during the review period. The following represents the planned portion sizes: • Monday – Fresh orange (1/2 cup) • Tuesday – Fresh banana (1/2 cup) • Wednesday – Fresh grapes (1/2 cup) • Thursday – Fruit, unspecified (1/2 cup) • Weekly – 3 cups The daily and weekly minimum requirements for the 9-12 age/grade group are 1 cup and 5 cups, respectively. |

Prairie du Chien Area School District

<u>Finding 2:</u> The daily and weekly minimum requirements for vegetables were not met for the 9/12 age/grade group for lunch during the review period. The following represents the planned portion sizes:

- Thursday Salad bar, no production records or planned serving sizes (1/2 cup); pizza sauce (1/8 cup)
- Friday Salad bar, no production records or planned serving sizes (1/2 cup); tater triangle (1/8 cup)
- Weekly 4 1/4 cups

The daily and weekly minimum requirements for the 9-12 age/grade group are 1 cup and 5 cups, respectively.

Fiscal action is required for repeat daily vegetable and grain shortage violations from the previous Administrative Review.

<u>Finding 3:</u> The daily minimum requirement for meat/meat alternate was not met for the 9/12 age/grade group for lunch during the review period. The following represents the planned portion sizes:

- Friday Sausage links, 3 each (1 ounce equivalent)
- The daily minimum requirement for the 9-12 age/grade group is 2-ounce equivalents.

<u>Finding 4:</u> The daily and weekly minimum requirements for grains was not met for the 9/12 age/grade group for lunch during the review period. The following represents the planned portion sizes:

- Wednesday Chicken patty, 1 each (1 ounce equivalent)
- Weekly 9.50-ounce equivalents.

The daily and weekly minimum requirements for the 9-12 age/grade group are 2-ounce equivalents and 10-ounce equivalents, respectively.

Corrective Action 1: Upload a lunch menu planning worksheet for the 9-12 age/grade group for the week of review (February 19 to 23, 2024) that meets all daily and weekly meal pattern requirements. Complete the menu planning worksheet to reflect the changes to the planned and served menu. Refer to the Lunch Meal Pattern Table (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/meal-pattern-tables-components).

<u>Corrective Action 2:</u> Review "Crediting In a Nutshell," posted on the Menu Planning webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-in-a-nutshell.pdf). Submit three to five sentences, summarizing the following:

- How to credit fruits, vegetables, and milk towards meal pattern requirements.
- How to credit meat/meat alternates and grains towards meal pattern requirements; and
- Identifying two reminders from the table on page one that apply to the breakfast and/or lunch menus at Prairie du Chien High School.

| Site Name | Prairie du Chien Hi |
|------------------------------|--|
| Form Name | Meal Components and Quantities - Review Period (409-412, 430-437) |
| Question # | 430 |
| Corrective Action History | Finding: The breakfast and lunch production record templates are missing required information, including: • Grade grouping(s) • Recipe name/reference number or product name/description |

| | Actual number of servings prepared Planned/actual quantity prepared in bulk units Amount leftover, and Planned serving size and usage for condiments. While there is no required production record template, examples are posted on the Production Records webpage (http://dpi.wi.gov/school-nutrition/national-schoollunch-program/menu-planning/production-records). Planned portion sizes are required for every menu item and condiments. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Please refer to the Production Record Requirements list (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). Corrective Action 1: Submit two weeks of completed breakfast, lunch, and salad bar production records. Choose a week (Monday to Friday) that occurs after the completion of the Administrative Review (AR) but before the corrective action due date. Corrective Action 2: Submit a certificate of completion of additional production record training for each school nutrition professional with responsibility for completing production records (SNT Production Records webcast [https://media.dpi.wi.gov/school-nutrition/final-production-records/story.html]). | |
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| Site Name | Prairie du Chien Hi | |
| Form Name | Meal Components and Quantities - Review Period (409-412, 430-437) | |
| Question # | 431 | |
| Corrective Action History | Finding: There were no serving sizes on the SALAD/GARDEN bar production records. SALAD/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). Corrective Action: Submit updated SALAD/GARDEN bar production records with serving sizes for each menu item. Although not required, DPI Salad Bar or Garden Bar Production Records may be used (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/salad-bar-production-record.xlsx; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/garden-bar-production-record.xlsx). | |
| Site Name | Prairie du Chien Hi | |
| Form Name | Meal Components and Quantities - Review Period (409-412, 430-437) | |
| Question # | 433 | |
| Corrective Action History | Finding: Crediting documentation was not submitted to the Public Health Nutritionist via SNACS prior to the onsite review. A binder provided by the Food Service Director revealed crediting documentation is not reviewed and updated (i.e. copies dated between 2012 and 2018) and included products, recipes, and templates not in use by the food service department. Processed foods not listed in the Food Buying Guide (FBG) | |

| | must be accompanied by a Product Formulation Statement (PFS) or Child Nutrition (CN) label to sufficiently document meal component crediting. Crediting documentation should be reviewed and updated at least twice per year and as new products are purchased. Corrective Action 1: Review "Crediting Documentation in a Nutshell," posted on the Menu Planning webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-documentation-in-a-nutshell.pdf). Submit three to five sentences, summarizing the following: List the acceptable forms of CN label documentation. Define a PFS and provide three examples of what a PFS is not; and Identify two additional types of crediting documentation. Corrective Action 2: Submit a step-by-step procedure for reviewing and updating crediting documentation. The procedure must include when crediting documentation will be updated, by whom, where crediting documentation will be saved and/or stored, and how substitutions will be handled. | |
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| Site Name | Prairie du Chien Hi | |
| Form Name | Meal Components and Quantities - Review Period (409-412, 430-437) | |
| Question # | 434 | |
| Corrective Action History | Finding: Standardized recipes are required for all menu items made inhouse with more than one ingredient. There was no standardized recipe for the Sloppy Joe on a Bun. Corrective Action: Submit a standardized recipe for the Sloppy Joe on a Bun. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). | |
| Site Name | Prairie du Chien Hi | |
| Form Name | Meal Components and Quantities - Review Period (409-412, 430-437) | |
| Question # | 436 | |
| Corrective Action History | Finding: At least 80% of the grains offered weekly on each serving line must be whole grain-rich. Only 76.7% of products offered at breakfast and 77.55% of products offered at lunch during the week of review were whole grain-rich. Breakfast • Daily – Malt O Meal Frosted Flakes Cereal (1 ounce equivalent) • Friday – Pop Tarts, Frosted S'mores (1.25-ounce equivalents) Lunch • Thursday – Rice Krispies Treat (0.75-ounce equivalents) • Friday – Krusteaz Homestyle Mini Pancakes, 8 each (2.0-ounce equivalents) Corrective Action: Describe how the menu would be changed to comply with the 80% whole grain-rich requirement. Be specific and include serving | |

Prairie du Chien Area School District

| | sizes, nutrition facts labels, ingredient lists, and/or crediting documentation for items that would be planned in place of enriched grain items. | |
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| Site Name | Prairie du Chien Hi | |
| Form Name | Meal Components and Quantities - Review Period (409-412, 430-437) | |
| Question # | 437 | |
| Corrective Action History | Finding: Fiscal action is required for a repeat missing vegetable subgroup and a repeat insufficient vegetable subgroup. Therefore, fiscal action will be assessed on Friday, February 23, 2024, the day during the week of review with the lowest participation. One hundred four lunch meals will be reclaimed at Prairie du Chien High School. Corrective Action: Complete the Corrective Action for Questions 410 and 431, which require a lunch menu planning worksheet and SALAD/GARDEN BAR production records, respectively. | |
| Site Name | Prairie du Chien Hi | |
| Form Name | Offer vs Serve (500-502) | |
| Question # | 501 | |
| Corrective Action History | Finding: Food service and school district staff were unclear about the Offer versus Serve (OVS) requirements for breakfast and lunch. Corrective Action: Submit a certificate of completion of Offer versus Serve AND Meal or No Meal Lesson and Game for each school nutrition professional with responsibility for determining reimbursable meals. Offer versus Serve webcast https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story.html Meal or No Meal Lesson and Game https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story.html | |
| Site Name | Prairie du Chien Hi | |
| Form Name | Civil Rights (811-812) | |
| Question # | 811 | |
| Corrective Action History | Finding: The nondiscrimination "And Justice for All" poster islocated in the meal service area and visible to students (FNS Instruction 113), however, is not the required 2019 or 2022 poster. What is posted is the 2015 poster. Corrective Action: Hang the correct year'sUSDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area. Provide an image of how this requirement will be met. If corrected while onsite, no further action required. | |
| Site Name | Prairie du Chien Hi | |
| Form Name | SFA On-Site Monitoring (901 - 904) | |
| Question # | 901 | |
| Corrective Action History | Finding: The SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8. Corrective Action 1: Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found | |

Page: 12 of 23

| | 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. Corrective Action 2: Submit a plan on how onsite monitoring will be completed for each school and program moving forward and the position responsible for completing this. | | | | | |
|------------------------------|---|--|--|--|--|--|
| Site Name | Prairie du Chien Hi | | | | | |
| Form Name | Smart Snacks (1104 - 1107) | | | | | |
| Question # | 1105 | | | | | |
| Corrective Action History | Finding: Shine Water is not allowable at any grade level. Low-calorie beverages contain less than or equal to 5 kcal/fluid ounces, and the maximum size is less than or equal to 12 fluid ounces. Shine Water contains 15 kcal and is 16.9 fluid ounces. More information is posted on the Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks). Corrective Action: Submit a statement agreeing to sell or remove the | | | | | |
| | remaining product from the vending machine in the Prairie du Chien High School cafeteria, and do not reorder or restock Shine Water. Alternatively, submit a statement agreeing to lock vending machine from midnight to 30 minutes after the end of instructional school day. | | | | | |
| Site Name | Prairie du Chien Hi | | | | | |
| Form Name | Smart Snacks (1104 - 1107) | | | | | |
| Question # | 1106 | | | | | |
| Corrective Action History | Finding: The Family and Consumer Science (FCS) Department sells snacks to students on the school campus, during the school day. Per the FCS Teacher, the Smart Snacks General and Nutrient Standards are reviewed with students, who conduct nutrient analyses of recipes using the Verywell Fit Recipe Analyzer (https://www.verywellfit.com/recipe-nutrition-analyzer-4157076). Notably, the Smart Snack Evaluation student assignment incorrectly lists "Contain 10% of the Daily Value of one of the nutrients of public health concern in the 2010 Dietary Guidelines for Americans (calcium, potassium, vitamin D, or dietary fiber)" as a general standard and lists 230 milligrams (mg), not 200 mg, as the nutrient standard for sodium. Results from the Verywell Fit Recipe Analyzer are inaccurate. The calculator makes assumptions about the ingredients, including but not limited to the brand, calories, fat, saturated fat, trans fat, sodium, and sugar. Furthermore, results do not include serving sizes in ounces or grams, so compliance with the nutrient standard for sugar cannot be assessed; the FCS Department sells snacks prepared from recipes that include sugar (e.g. pumpkin bars, banana bars, fruit pizza, applesauce muffins, etc.). The FCS Department intended to comply with the state-defined limit on fundraisers. | | | | | |
| | Corrective Action – Option 1: Submit a statement agreeing to discontinue snack sales for the remainder of the current school year (SY) and upcoming SYs, until an accurate process for evaluating compliance with the Smart Snacks General and Nutrient Standards is established. The process must include training, such as School Nutrition Summer Training or the School Nutrition Online Learning Library. The process must also assign responsibility for tracking both compliant and non-compliant sales. Per the | | | | | |

| | FCS Teacher, she will retire at the end of SY 23-24, and recruitment to fill her vacancy in the upcoming SY was unsuccessful. The FCS Department used its fundraiser exemptions for the school year. Corrective Action – Option 2: Submit evaluation of snacks sold to students on the school campus, during the school day based on nutrition facts labels with ingredient statements, the Smart Snacks Product Calculator, the Smart Snacks Recipe Analyzer Tool, or similar (https://foodplanner.healthiergeneration.org/calculator/; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/recipe-analyzer-tool.xlsx). Results from the Verywell Fit Recipe Analyzer cannot be accepted. Demonstrate compliance with Smart Snacks General and Nutrient Standards prior to resuming snack sales. | | | | | |
|------------------------------|--|--|--|--|--|--|
| Site Name | Prairie du Chien Hi | | | | | |
| Form Name | Food Safety, Storage and Buy American (1404-1411) | | | | | |
| Question # | 1404 | | | | | |
| Corrective Action History | Finding: Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). 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). The food safety plan was missing the following information: Field Trip Meals andApproved Food Source, accepting donations or purchasing locally grown produce. Corrective Action: Update the food safety plan to include the missing information and upload the updated portions of the food safety plan into SNACS. | | | | | |
| Site Name | Prairie du Chien Hi | | | | | |
| Form Name | Food Safety, Storage and Buy American (1404-1411) | | | | | |
| Question # | 1409 | | | | | |
| Corrective Action History | Finding: SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The following food storage violations were observed: Dry Storage: Several food items were opened and put into clear plastic bags without labels or dates. Bag of pasta was opened. Walk-In Cooler: S Gallon bucket of unknown food product was on the floor. Large bag of whole carrots was ripped open and not closed properly. S bags of potato wedges were in clear plastic bags without labels or dates. Turkey was thawing above ready to eat foods. Corrective Action: If possible, correct all observed storage violations during the on-site review. If the violation cannot be corrected during the on-site | | | | | |

Prairie du Chien Area School District

| | review, submit a photoindicating that food safety violations have been corrected. | | | | |
|------------------------------|--|--|--|--|--|
| Site Name | Prairie du Chien Hi | | | | |
| Form Name | Food Safety, Storage and Buy American (1404-1411) | | | | |
| Question # | 1410 | | | | |
| Corrective Action History | Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: • Marengo Grape Tomatoes (Mexico) • Topline Cucumbers (Canada) • World Horizons Mandarin Orange Segments in Light Syrup (China) • World Horizons Pineapple Tidbits in Natural Juice (Indonesia, Thailand, and Malaysia) Corrective Action 1: Complete and submit a Noncompliant Product List Form for the non-domestic products: • Marengo Grape Tomatoes (Mexico) • Topline Cucumbers (Canada) • World Horizons Mandarin Orange Segments in Light Syrup (China) • World Horizons Pineapple Tidbits in Natural Juice (Indonesia, Thailand, and Malaysia) Noncompliant Product List templates are posted on the Buy American Provision webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american). Corrective Action 2: Submit a step-by-step procedure for reviewing and updating the Buy American Non-Compliant Product List. The procedure must include when the list will be updated, by whom, where the list will be saved and/or stored, and how substitutions will be handled. | | | | |

| Technical Ass | sistance | Entries: |
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| | # | TA Area | Site | SFA Contact |
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| 03/28/2024 4839 | | Administrative Review | | Food Service Director/Authorized Representative |

Comments

It is recommended that there be multiple staff members completing the administrative duties associated within the Child Nutrition Programs. Many districts across the state have several staff who assist their Food Service Director (FSD) with these tasks. This helps alleviate the administrative burden and allows the FSD to have more time to manage a successful kitchen and food service program. Hiring an administrative assistant or paying an already employed assistant who has Child Nutrition Program responsibilities for the time used to assist with the programs is an allowable cost to Fund 50, for more information on allowable costs please refer to the Expenditure Categories for Food Service AFR document located on the School Nutrition Financial Management webpage.

| Comments | | | | | | |
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| 04/22/2024 | 4789 | Administrative Review | Food Service Director | | | |

Eighty percent of the weekly grains offered and credited in school meal programs must be whole grain-rich.

Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched.

| 04/22/2024 | 4/88 | Administrative Review | Food Service Director |
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Prairie du Chien Area School District

Comments

If products being used are different from the usual products, it is important to evaluate how the substituted products credit. Both the daily minimum requirements and weekly minimums must be met, even when using substitutions.

04/22/2024 4787 Administrative Review Food Service Director

Comments

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Be specific on production records about the identity, brand, portion size, and description of items served.

04/22/2024 4786 Administrative Review Food Service Director

Comments

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products.

A "Domestic Commodity or Product" is an agricultural commodity or product that is produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands). For domestic products without country-of-origin labeling, 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.

04/22/2024 4785 Administrative Review Food Service Director

Comments

The type of fruit served at each day was not recorded on the breakfast production record. The specific type(s) of fruit offered, along with planned portion size(s), must be included to document this component was planned and served. The production record should reflect substitutions, if any are made.

04/22/2024 4784 Administrative Review Food Service Director

Comments

Using the vegetables on the garden bar/salad bar to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. Salad Bar Signage Template can be found on our Signage webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).

04/22/2024 4783 Administrative Review Food Service Director

Comments

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. The breakfast signage must list the three components and the four items offered, and must communicate to students that under OVS, they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination.

04/22/2024 4782 Administrative Review Food Service Director

Comments

The USDA Food Buying Guide (FBG) contains yield and crediting information for foods with a standard of identity (https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs). Fruits, vegetables, grains, meat/meat alternates (M/MA), and dairy can be credited using the FBG. Most fruits and vegetables credit by volume served and most M/MAs and grains credit by weight. If the product is not listed in the FBG, additional crediting documentation is required. Processed products not listed in the FBG require a Child Nutrition (CN) label,

Prairie du Chien Area School District

product formulation statement (PFS), or USDA Product Information Sheet to credit toward the meal pattern. There is a difference between product specification sheets and PFS.

- A <u>product specification sheet</u> identifies specifics of the product such as product code, case weight, shelf life, and packing information. Product specification sheets are not acceptable forms of crediting documentation.
- A <u>PFS</u> is considered acceptable crediting documentation, and it shows exactly how a product contributes to the meal pattern with entries from the FBG. A PFS is required for processed products not listed in the FBG that do not have a CN label or USDA Product Information Sheet. A PFS must be from the manufacturer and include product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern; and an original signature from the manufacturer certifying the information is correct.

The crediting decision-making tree (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-decision-making-tree.pdf) helps staff determine what types of documentation are needed. Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. Maintain and organize this information in a manner that is easy to reference and update, such as a binder, file folders divided into categories, or organized as digital files. These records should be reviewed and updated at least twice per year and as new products are purchased.

| Service Director | 03/28/2024 4674 | Administrative Review | Authorized Representative/Food Service Director |
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Comments

Per USDA policy memo <u>SP 46-2016</u>, no later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to unpaid meal charges. Policies developed at the SFA level must be provided to the state agency during the administrative review.

| 03/28/2024 | 4673 | Administrative Review | | Authorized Representative |
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Comments

The Annual Financial Report Manual is located on the DPI website to assist you with completing the AFR. 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 nonprogram food compliance.

The categories of the AFR that should be addressed when tracking revenues and expenditures include:

- 'Labor' is expenses for all direct food service labor including both wages and fringe benefit costs.
- 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc.
- 'Food' is expenses for edible food items and beverages.
- 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold.
- 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc.
- 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings.
- When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your 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 your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

| Comments | | | | | | | |
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| | | | | Service Director | | | |
| 03/28/2024 4672 Administrative Review Authorized Representative/Food | | | | | | | |

The LWP requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires SFAs to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

Page: 17 of 23

Prairie du Chien Area School District

SFAs are required to have language in their LWP that relates to all the content areas listed in the LWP Checklist found on the Local Wellness Policy section of the DPI SNT website.

SFAs are required to complete an assessment of their local wellness policy (LWP) at least once every three years per 7 CFR 210.31(e)(2)).

The SFA's first triennial assessment must be completed by June 30, 2020 (for SFAs that were participating in 2016-2017 school year).

03/28/2024 4671 Administrative Review Food Service Director

Comments

All food service employees must have a signed **Employee Reporting Agreement** on file. The agreement helps ensure employees properly notify the person in charge when they experience specific illness symptoms or diagnoses. There are no requirements as to how frequently food service employees must sign an Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information.

03/28/2024 4670 Administrative Review Food Service Director/Authorized Representative

Comments

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.

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 quardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Districts develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination. The Special Dietary Needs Policy template can be used to create a policy/procedure for your school or district. This template should be modified to fit the needs of your school or district. If your district already has a policy in place, we recommend comparing it to this policy to ensure your policy includes all important information.

It is recommended, but not required, for SFAs to use the WI DPI Medical Statement - English (Spanish) (Hmong) for Special Dietary Needs found on the Special Dietary Needs webpage. At a minimum the statement must include:

- an explanation of how the child's physical or mental impairment restricts the child's diet
- the food(s) to be avoided
- the food or choice of foods that must be substituted.
- 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.

03/28/2024 4669 Administrative Review Food Service Director/Authorized Representative

Comments

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.

| 03/28/2024 | 4668 | Administrative Review | Food Service Director/Authorized Representative |
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Comments

'And Justice for All" posters must be posted where the program is offered (lunchroom, classrooms) and in easy view of the students, staff, and public. The "And Justice for All" poster was updated in 2022, we do not have professionally printed posters from USDA. Schools will need to post the USDA 2019 AJFA poster until the professionally printed USDA 2022 posters are available.

Prairie du Chien Area School District

The 2019 version of the AJFA poster (AD-475A) is located on the Office of the Assistant Secretary for Civil Rights website at: https://www.usda.gov/sites/default/files/documents/JFAgreen508.pdf All "And Justice for All" posters must be printed at 11" width x 17" height. The minimum text size to be used on the posters is 14-point. 03/28/2024 4667 Administrative Review Food Service Director Comments LEAs that have a 5% or more error rate during the certification review of the Administrative Review will be required to conduct a second independent review of applications in the following school year. More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed from DPI during the summer following the year the review occurred with more information for those SFAs that are required to conduct an independent review of applications. 03/28/2024 4649 Administrative Review Food Service Director **Comments** Most districts and private schools participating in the National School Lunch Program are required to run full **enrollment** student input files: 1st: **beginning of the year** (between July 1 - first day of school) 2nd: **three months after first run** (between October - December) 3rd: **six months after first run** (between January - March) • 4th: **between March 15 and April 1** (for CEP proxy report) 03/28/2024 4648 Administrative Review Food Service Director **Comments** If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, runaway or Head Start program, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency before meal benefits can be provided. 03/28/2024 4647 Administrative Review Food Service Director Comments The total household member size box includes all children and adults in the household and must match the number of names on the application for that application to be considered complete. 03/28/2024 4646 Administrative Review Food Service Director **Comments** Applications must be reviewed in a timely manner. Within 10 operating (school) days of receipt, eligibility must be determined, families must be notified of eligibility status, and the status must be implemented. 03/28/2024 4682 Administrative Review Food Service Director/Authorized Representative Comments Your agency's online claiming rights have been temporarily suspended. Your agency cannot submit a claim through the Online Services claiming portal at this time until the 2023-2024 school year administrative review has been closed. While your agency is unable to submit claims through Online Services, the monthly claim Excel file must be emailed as an attachment to Jacqueline, darrow@dpi.wi.gov, Your claim must be received **no later than 60 days** from the last day of the claiming month to be eligible for payment. Once the outstanding issue(s) have been resolved, the agencies online claiming rights will be restored to allow claims to be submitted through Online Services.

03/28/2024

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Administrative Review

ALL

Page: 19 of 23

Food Service Director/Authorized

Representative

Prairie du Chien Area School District

Comments

<u>Supply Chain Assistance (SCA) Funds</u> 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 <u>Allocation of Supply Chain Assistance Funds to Alleviate Supply Chain Disruptions in the School Meal Programs: Questions and Answers</u> includes detailed information on allowable ways to utilize these funds. 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 <u>Supply Chain Assistance (SCA) Funds Expense Tracker</u> that SFAs may use to track these funds, however, SFAs may use any form of tracking.

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.

| 03/28/2024 | 4681 | Administrative Review | Food Service Director/Authorized |
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| | | | Representative |

Comments

It is highly recommended that the authorized representative and food service director use the <u>Calendar of Program Requirements</u> to help keep track of tasks and due dates. The digital version of the calendar has links included, though it could also be printed and written on as tasks are completed. The calendar is designed to be fairly comprehensive and is generally organized in the order that things must be completed each year.

| 03/28/2024 | 4630 | 901 | Administrative Review | Prairie du | Food Service Director |
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Comments

Every school year, SFAs with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP. Monitoring is due by February 1. The NSLP On-Site Monitoring Form and the SBP On-Site Monitoring Form forms are on the Onsite Monitoring section of the DPI SNT website.

| 03/28/2024 | 4829 | Administrative Review | FSD/AR |
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Comments

Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this "In A Nutshell-Training" document.

Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, SNA, ICN, in-house, etc.).

SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. The DPI Professional Standards Tracking Tool or the USDA Professional Standards Tracking Tool are encouraged but not required.

| | 03/28/2024 | 4828 | | Administrative Review | | FSD/AR | |
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Comments

Meals must be counted at the point of service (POS) where it can be accurately determined that a reimbursable meal has been served. Only one meal per student per meal service may be claimed for reimbursement. Some meal count systems that are not acceptable include:

- Attendance/classroom meal counts meal counts prior to meal service are important for production purposes but do not provide an accurate count of meals served.
- Tray or entrée counts tray or entrée counts do not ensure all required components were on the tray, trays were not stuck together, or that each entrée was part of a reimbursable meal.

Prairie du Chien Area School District

• Backout counts – Counting the number of leftover meals from the starting meal count do not account for dropped trays, or that each entrée was part of a reimbursable meal.

03/28/2024 4827 Administrative Review FSD/AR

Comments

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 by all food service staff. A prototype food safety plan template as well as template SOPs may be found on the SNT Food Safety webpage. 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.

03/28/2024 4826 Administrative Review FSD/AR

Comments

Staff must record temperatures daily using temperature logs. This includes temperatures of all foods that are served on the salad bars. For cooling equipment, posting temperature logs directly on the equipment can make recording convenient and routine. Temperature logs are required to be kept 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.

03/28/2024 4825 Administrative Review FSD/AR

Comments

When an application(s) is chosen for verification, the person designated as the *Confirming Official* must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application. After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications selected [7 CFR 245.6a(e)(2)]. Applications may be replaced when the LEA believes the household would be unable to satisfactorily respond to the verification request. This action should be documented.

The LEA must make at least one attempt to contact the household when the household does not respond to the request for verification [7 CFR 245.6a(f)(6)]. "Non-response" includes no response and incomplete or ambiguous responses that do not permit the LEA to resolve children's eligibility for free and reduced-price meals. The required follow-up attempt may be in writing (mail or e-mail) or by telephone or text message.

When a benefit eligibility status increases, the change must take place within three days. When benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year, and schools should remind families their children may become eligible for meal benefits if the household unit experiences a change in financial circumstances (i.e., household size goes up or income goes down). However, if benefits to a household have been terminated because of failure to complete the verification or verification for cause process and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in Assistance Programs at the time of reapplication [7 CFR 245.6a(f)(7)]. These are not considered new applications.

03/28/2024 4824 Administrative Review Food Service Director/Authorized Representative

Comments

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. Other examples of program records that must be kept for three years plus the current year are:

• Claims for Reimbursement (including supporting documentation, such as point-of-service benefit issuance rosters);

Prairie du Chien Area School District

- 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.

| Representative | 03/28/2024 | 4823 | Administrative Review | Food Service Director/Authorized Representative |
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Comments

When a child transfers to a new school within the same Local Education Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination. Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools is required.

| 03/28/2024 | 4822 | Adm | ninistrative Review | Food Service Director/Authorized |
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| | | | | Representative |

Comments

SFAs are required to inform families where to find free summer meals. It is recommended to share the following in an end of year newsletter and on the SFA website:

To find free summer meal locations:

- Call 211 to locate meals in the area
- Text 'food' (in English or Spanish) to 304-304
- Check the Site Finder Map
 - Summer Meals Site Finder English
 - Summer Meals Site Finder Spanish
- Visit the Summer Food Service Program webpage

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| 03/28/2024 | 4821 | Administrative Review | Food Service Director/Authorized |
| | | | Representative |

Prairie du Chien Area School District

Comments

The unpaid meal charge policy must explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in-hand to cover the cost of their meal at the time of service. If a child has money to purchase a reduced-price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay unpaid charges if the child intends to use the money to purchase that day's meal. This policy should be implemented and enforced SFA-wide and must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school district during the school year. Only posting the policy to the school website does not meet the requirement. This policy must also be provided in writing to all school or SFA-level staff who are responsible for policy enforcement. SFAs are encouraged to provide information about the policy to principals and other school or district administrators to ensure the policy is supported. Schools may not enlist the assistance of unauthorized persons, such as parent or guardian volunteers, to follow up with debt collection efforts. SFAs are encouraged to review the policy on a regular basis (e.g., annually or biannually).

| 03/27/2024 | 4626 | 433 | Administrative Review | Prairie du | Food Service Director |
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Comments

In-house yield may be used to credit foods towards meal pattern requirements. Original documentation of procedures used to determine yield must be completed and maintained. An in-house yield study may be warranted if yields are consistently higher or lower than specified in the USDA Food Buying Guide (FBG), or for foods or sizes not currently listed. In-House Yield Study Procedures are available on the Menu Planning webpage, under the Crediting tab. (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ihy).

| 03/27/2024 | 4625 | Administrative Review | | Food Service Director |
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Comments

Extra, non-creditable items such as gelatin desserts, pudding, and potato chips are frequently offered. These foods do not credit toward the meal pattern but must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra, non-creditable items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extras are frequently served.

| 03/27/2024 | 4624 | Administrative Review | Food Service Director |
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Comments

Sodium Target 1 was mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 and is currently in effect with Interim Target 1A taking effect for the school year 2023-2024. Products that can be major contributors of sodium include condiments, regular canned vegetables, regular canned soups, deli meats, and processed foods (e.g. gravy and sauce mixes, potato and tortilla chips, beef and chicken base, etc.). Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years. The WI DPI encourages schools to "keep in mind the best interests of the students and provide our school children with the most healthful and nutritious meals possible."