## Administrative Review Report

Sun Prairie Area School District

### Commendations:

Our sincere thanks to the staff at Sun Prairie Area School District for your warm welcome. We appreciate the time and efforts spent preparing for and participating in the administrative review. We recognize and appreciate your willingness to continuously learn about the USDA School Meals Programs and be receptive to feedback and technical assistance. Thank you for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions.

We were impressed with how well all staff work as a team to maintain a quality lunch program. They had friendly smiles for the students, greeted them by name, and very obviously take a lot of pride in their work.

Awesome job and thank you for what you do for kids!

#### Recommendations:

See the **DPI School Nutrition Webpage** for up-to-date guidance, forms, and training opportunities.

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.

For in depth technical assistance, including program links see the 2023-24 General Program Reminders which has been uploaded to the documents tab in SNACS.

Help the SNT reach our goal of 80 SFAs participating in Around the World in 80 Trays the week of January 15-19, 2024. Take the pledge to participate in any capacity from adding a new dip or seasoning to showcasing several new dishes. It is up to you! Visit the Around the World in 80 Trays webpage to take the pledge and find more event information. Document the event (pictures, video, sound clips, etc.) and send to DPIFNS@dpi.wi.gov so we can share your success!

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## Findings and Corrective Action:

Site Name			
Form Name	Certification and Benefi	t Issuance (100 - 121)	
Corrective Action History	Flagged 12/07/2023 01:40 PM	Finding: The SFA did not provide instructions on entering the categorically eligible program name in Infinite Campus software as notified by Infinite Campus in June 2023.  Corrective Action: Update the Infinite Campus online application to include the necessary instructions to indicate the eligible program name. Upload a screenshot from Infinite Campus that includes these instructions.	
Site Name			
Form Name	Indirect Costs (712)		
Corrective Action History	Flagged 12/07/2023 09:37 AM	Finding: The indirect cost of 20% of drivers' salaries are being charged to the nonprofit school food service account without a valid annual time study, which is unallowable in Wisconsin. All costs charged to the nonprofit school food service account must be made into direct costs.  Corrective Action: Complete a time study to show the actual time drivers spend associated with food service activities. Determine the percentage of time charged to food service using this time study and bill accordingly to the food service account. A new time study must be completed each school year. Upload a copy of the time study and provide a statement of what percentage will be charged to the food service account. Fiscal action may be assessed following receipt of the time study.	
Site Name			
Form Name	Civil Rights (800 - 807)		
Corrective Action History	Flagged 12/07/2023 09:44 AM	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.	
Site Name			
Form Name	Civil Rights (800 - 807)		
Corrective Action Status	CAP Submitted		
Corrective Action History	Flagged 12/07/2023 09:43 AM	<b>Finding:</b> Civil Rights training was not completed for all staff who interact with program participants in the current school year (FNS Instruction 113-1).	

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		Corrective Action: Provide the civil rights training to all staff. Corrected on-site, NO FURTHER ACTION NEEDED.	
Site Name			
Form Name	Local School Wellness (	1000 - 1006)	
Corrective Action History	Flagged 12/07/2023 09:48 AM	Finding: 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. The following required areas are missing. Included are suggested places and ways to add these areas:  Policy Leadership: It is great to have each school's administration overseeing their school; however, there needs to be one person that oversees everything. This requirement could be added to 9 in the existing policy; The superintendent shall implement and ensure compliance with the policy by leading the review, update, and evaluation of the policy.  Public Involvement: This requirement could be added to 9 in the existing policy; The district will invite a diverse group of stakeholders to participate in the development, implementation, and periodic review and update of the policy.  Food and Beverage Marketing: This requirement could be added to 6 in the existing policy; Schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule.  Corrective Action: Provide a timeline when the three areas will be added to the Local Wellness Policy.	
Site Name			
Form Name	Certification and Benefi	t Issuance (124 - 142)	
Corrective Action History	Flagged 12/13/2023 04:09 PM	Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). Three students were approved free using BadgerCare as the categorically eligible program. This program does not qualify.  Corrective Action: Contact families to submit income or qualifying program information to determine the correct meal benefit.Corrected onsite, NO FURTHER ACTION NEEDED.	
Site Name			
Form Name	Certification and Benefit Issuance (124 - 142)		
Corrective Action History	Flagged 12/07/2023 01:47 PM	<b>Finding</b> : Applications were approved based on BadgerCare as a categorically eligible program. As stated on the application,	

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	BadgerCare is not an eligible program to qualify for free and reduced meal benefits.	
	<b>Corrective Action</b> : There were three applications in the statistical sample approved with BadgerCare.	
	1. Obtain correct eligibility information or change the benefit eligibility to paid. This was corrected on-site, NO FURTHER ACTION NEEDED.	
	2. Review remaining applications. Obtain correct the eligibility information or change the benefit status to paid for all remaining applications that were approved with BadgerCare.Provide a statement in SNACS when this is complete.	
Verification (207 - 215)		
Flagged	<b>Finding:</b> One application chosen for verification was verified using BadgerCare.	
12/07/2023 01:49 PM	Corrective Action: Obtain correct eligibility information or change to paid eligibility status. Upload a statement in SNACS indicating how this family qualifies for meals.	
Civil Rights (809 - 810)		
Flagged	<b>Finding:</b> The correct non-discrimination statement was not included on all program materials.	
12/06/2023 05:13 PM	Corrective Action: Update the following materials to include the correct non-discrimination statement: Application approval/denial letter Website DC Notification letter Verification -We Must Check Corrected on-site, NO FURTHER ACTION NECESSARY.	
Food Safety & Buy Amer	rican (1400 - 1403)	
Flagged	Finding: The following products were identified in the SFA's	
12/07/2023 01:19 PM	storage area at West High School as non-domestic and not documented:  • Cucumbers- Product of Mexico	
	Flagged 12/07/2023 01:49 PM  Civil Rights (809 - 810) Flagged 12/06/2023 05:13 PM  Food Safety & Buy Amer	

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		The following product was identified in the storage area at Central Heights Middle School as non-domestic and not documented:  • California Blend Vegetables- Product of Mexico  Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products.  Noncompliant Product List templates can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american). If no country of origin is identified on the label, then the SFA must get documentation/certification from the distributor or supplier.	
Site Name			
Form Name	Meal Counting and Clair	ming - Day of Review (317-321)	
Corrective Action History	Flagged 12/07/2023 09:29 AM	Finding: Meal counts were not taken as the student received their reimbursable meal. Adults picked up meals for students receiving special education services and students with restricted access to the cafeteria. The meals were counted when the adult picked up the meal instead of at the point of service to the student.  Corrective Action: Provide a statement of how the meal counting process will be corrected to ensure meals are tracked as the student receives their meal.	
Site Name	Meadow View El		
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)		
Corrective Action History	Flagged 12/08/2023 10:10 AM	Finding: During the week of review, a breakfast kit was served to the Pre-K students at Meadowview Elementary. One of the breakfast kit varieties included a Cocoa Puffs cereal bowl that exceeded the allowable sugar limit.  The infant and preschool meal patterns require cereal to contain no more than 6 grams of total sugars per dry ounce.  Corrective Action: Discontinue serving the breakfast kit that includes the cereal that exceeds the sugar limit. Submit the Nutrition Facts label, if applicable, for any replacement cereal that is added to the planned menu.	
Site Name	West High School		
Form Name	Meal Components and C	Quantities - Review Period (409-412, 430-437)	
Corrective Action History	Flagged 12/15/2023 11:04 AM	Finding: West High School- Distributed dining area 1617; Missing Vegetable Component. West High School serves meals from the main cafeteria area and two distributed dining areas within the school. It was determined that the 1617 distributed dining area had a missing vegetable component during the week of review for certain entrée	

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		options that were served. Fiscal action is required for a missing component.
		Due to the missing vegetable component being a systemic issue, production records were reviewed for the entire review month (November), and then the entire school year. The 1617 distributed dining area opened on 10/09/23, and the missing vegetable component was noted from the opening date through 11/29/23, per the completed production records. Starting 11/30/23, a side salad (crediting as 1.5 cup of vegetable) was offered to students at this dining area.
		The entrée options that did not give students access to 1 cup of vegetable during this time frame and are subject to fiscal action include the PB & J lunch, Ham & Cheese lunch, Turkey and Cheese sub lunch, and Italian sub lunch.
		Per USDA, fiscal action must be taken "for all sites, reviewed and non reviewed, in which the non-reimbursable meals were served." Production records were reviewed from the meals served to the 9-12 age/grade group at East High School during the week of review, and it was determined there was no missing vegetable component.
		<b>Corrective Action 1</b> : Fiscal action will be assessed for a total of 1,334 meals. Submit a statement that explains specifically how the menu would be changed to ensure no missing components.
		Corrective Action 2: Submit one week of completed lunch production records from the 1617 distributed dining area showing that at least 1 cup of vegetable is being offered to students. This week should occur after receipt of the administrative review report, but before the corrective action due date.
Site Name	Meadow View El	
Form Name	Meal Components and C	Quantities - Review Period (409-412, 430-437)
Corrective Action History	Flagged 12/08/2023 10:11 AM	Finding: During the week of review, a breakfast kit was served to the Pre-K students at Meadowview Elementary. One of the breakfast kit varieties included a cheerio cereal bar, which is considered a grain-based dessert. Grain-based desserts are not creditable towards the grain component in the Preschool Meal Pattern.
		Corrective Action: Submit a statement specifically explaining how the menu will be changed so that preschool students are no longer served grain-based desserts as a creditable grain. Submit the Nutrition Facts label, ingredient list, crediting

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		documentation, or recipe, if applicable, for any replacement items added to the planned menu.	
Site Name	West High School		
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)		
Corrective Action History	Flagged 12/14/2023 11:47 AM	Finding: Fiscal action is required for any repeat daily meat/meat alternate (M/MA) shortage violations from the previous Administrative Review. On 11/15/23, pasta with meat sauce was served from the main line in the cafeteria. The standardized recipe for the spaghetti sauce was inaccurately credited, which resulted in the component shortage.  The standardized recipe includes 5 lbs of beef crumbles and makes a total of 40 portions.  The CN label for the cooked beef pattie crumbles indicates that each 2.50 oz (by weight) of cooked beef pattie crumbles provides 2.00 oz eq M/MA for the Child Nutrition Meal Pattern Requirements.  If 2.5 oz = 2 oz eq M/MA, Then 80 oz = 64 oz eq M/MA  64 oz eq M/MA / 40 portions = 1.6 oz eq M/MA, rounded down to 1.5 oz eq M/MA per serving.  The daily requirement for the 9-12 age/grade group is 2 oz eq M/MA.  Therefore, fiscal action will be assessed on 11/15/23, the day with the insufficient M/MA quantity. 160 meals for 9-12 students will be reclaimed at West High School.  Per USDA, fiscal action must be taken "for all sites, reviewed and non reviewed, in which the non-reimbursable meals were served." This means that the pasta with meat sauce meals served to 9-12 graders at East High School on 11/15/23 will be reclaimed. 167 meals for 9-12 students will be reclaimed at East High School.	
		Corrective Action: Fiscal action will be assessed for a total of 327 meals. Submit a statement that explains specifically how the menu would be changed to ensure no M/MA shortage for the 9-12 age/grade group on this day.	
Site Name	West High School		
Form Name	-	Quantities - Review Period (409-412, 430-437)	
Corrective Action History	Flagged Finding: West High School- Distributed dining area 1617; Missing Fruit Component. Due to Finding #409 and the missing vegetable component during the week of review at		

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	Jan Han	TIE Area School District	
		the distributed dining area, the review was opened to the review month (November). The missing component was found to be a systemic issue as it was missing daily, and the review was opened back to the date this dining area started service (10/09/23). The review of records from this date showed that there was also a missing fruit component for the entrée salads that were served from 10/09-10/16/23. The entrée options that did not give students access to 1 cup of fruit during this time frame and are subject to fiscal action include the Garden Salad, Crispy Chicken Salad, and the Chicken Caesar Salad. Fiscal action is required for a missing component.  Starting 10/17/23, applesauce cups (½ cup) and craisins (½ cup) were available on the side, giving students access to 1 cup of fruit.  Corrective Action: Fiscal action will be assessed for a total of 29 meals. Submit a statement that explains specifically how the menu at the distributed dining area would be changed to ensure no missing fruit component. Compliance with this	
		meal pattern requirement will also be verified with the production records that are submitted as corrective action	
		for Finding #409.	
Site Name	West High School		
Form Name	Meal Components and C	Quantities - Review Period (409-412, 430-437)	
Corrective Action History	Flagged 12/15/2023 11:54 AM	Finding: West High School- Distributed dining area 1617; Fruit Shortage. Due to Finding #409 and the missing vegetable component during the week of review at the 1617 distributed dining area, the review was opened to the review month (November). The missing component was found to be a systemic issue as it was missing daily, and the review was opened back to the date this dining area started service (10/09/23). This review of production records from this date showed that there was also a fruit shortage for the PB & D Lunch meal, Ham & D Lunch, Turkey & D Lunch, and the Italian Sub Lunch from 10/09-10/16/23. The standardized recipes for these meals indicate that only a ½ cup of fruit was served with each meal. The daily requirement for the 9-12 age/grade group is 1 cup of fruit.	
		Starting 10/17/23, applesauce cups (½ cup) and craisins (½ cup) were available on the side, giving students access to 1 cup of fruit.  As a reminder, if a daily fruit shortage would be found at lunch on the next Administrative Review, fiscal action would be required.	

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		Corrective Action: Submit a statement that explains specifically how the menu would be changed to ensure no fruit shortage for the 9-12 age/grade group at the distributed dining area. Compliance with this meal pattern requirement will also be verified with the production records that are submitted as corrective action for Finding #409.
Site Name	Central Heights Middle	
Form Name	Meal Components and C	Quantities - Review Period (409-412, 430-437)
Corrective Action History	Flagged 12/11/2023 01:51 PM	Finding: The 6-8 meal pattern requires the menu planner to offer students a certain amount of vegetable subgroups over the course of the week. Based on the planned menu and production records provided for Central Heights Middle School, no vegetables from the beans/peas/legumes were offered during the week of review, 11/13-11/17/23.  The taco salad was an alternate entrée on the menu on 11/15/23 and included .25c of pinto beans (beans/peas/legumes). However, since there were multiple entrée options available to students on this day, and each entrée is evaluated for meal pattern compliance individually, students who may have taken a different entrée option did not have access to the beans/peas/legumes subgroup at all.  The minimum required amount for the beans and peas (legumes) subgroup over the course of the week is 1/2cup.  Corrective Action: Describe specifically how the weekly shortage will be fixed during the week of review. Include product information, standardized recipes, and the serving size of the added vegetable with the statement.
Site Name	West High School	
Form Name	Smart Snacks (1104 - 11	.07)
Corrective Action History	Flagged 12/13/2023 03:00 PM	Finding: Insufficient Smart Snacks compliance documentation and selling of non-compliant foods. The ProStart Class at West High School offers a variety of foods and beverages, including coffee beverages, bagels, wraps, and sides, to students throughout the school day. However, there is insufficient documentation to determine compliance with Smart Snacks standards for many of these items. It is essential to ensure that all food and beverage sales on the school campus during the school day meet both the Smart Snacks general standards and nutrient standards, unless the sales qualify for an exemption.  Corrective Action 1: Submit standardized recipes for all foods and beverages prepared with more than one ingredient and currently sold by the ProStart Class at West High School. Recipes should include nutrient information to determine

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	compliance with the Smart Snacks nutrient standards. Submit nutrition facts labels with ingredient statements and Smart Snacks calculator results (https://foodplanner.healthiergeneration.org/calculator/) for any prepackaged foods or beverages sold by the class.  Corrective Action 2: Submit a written statement outlining who will be responsible for oversight of the Smart Snack regulations at West High School. Within this statement, include the process for how this individual will track compliance going forward.		
Site Name	Central Heights Middle		
Form Name	Smart Snacks (1104 - 1107)		
Corrective Action History	Flagged 12/07/2023 01:27 PM	Finding: The Vita Ice Sparkling Water is not allowable at the middle school level. Only plain water, 100% juice, or milk are allowable Smart Snack beverages in middle schools. More information can be found on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).  Corrective Action: State what will be done with this product to comply with the Smart Snack regulations.	

### **Technical Assistance Entries:**

Comments		
	Created By	Created Date

**Production Records; Variety Item Recipes:** Breakfast production records at each site should list each flavor or variety of cereal, juice, breakfast bars, and muffins offered daily. This will ensure what the menu planner plans to offer each day is followed. This practice will also help with forecasting, controlling waste, and controlling food costs. If it becomes too time- or labor-intensive to record breakfast item usage by type, consider using variety item recipes. Individual recipes document average cereal, juice, or other breakfast item usage by meal and grade group. When a variety item recipe is on file, you may then continue to document total usage on the production record. Variety item recipes must be updated twice per year or when students' preferences change. The variety item recipe template found on DPI website can be adjusted for use in your own kitchen (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/variety-item-recipe.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/variety-item-recipe.xlsx</a>).

# Comments Created By Created Date

**Pro-Start Class Competitive Food Sales:** The Pro-Start class sells foods during breakfast and lunch periods, in direct competition with the school meals program. Lost food service revenue has negative effects on the whole district from outdated kitchens, lower food quality, and possible revenue transfers needed from the general school fund to the food service fund. Pro-Start could consider selling items that are not in competition with school meals and at times that are not in competition with school meal service times. For example, there is not a USDA snack program available during the school day, but there is often a need for snacks during this time. Foods and beverages sold by organizations other than the School Nutrition Program must meet Smart Snacks standards. School Nutrition Staff cannot use time billed to the Nonprofit Food Service Account to determine Smart Snacks compliance for these items.

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# Comments Created By Created Date

Smart Snacks: The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards, unless the sales qualify for an exemption. More information is available on <a href="WI DPI's Smart Snacks webpage">WI DPI's Smart Snacks webpage</a> (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).

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Standardized Recipes: Standardized recipes are on file for all menu items made with more than one ingredient, however it was noted during on-site observations that each site has a binder of typed recipes that sometimes vary slightly from the recipes at the district office. If schools are making any changes to the recipes and standardizing them to their specific operation, then the meal component contribution needs to accurately reflect these changes. The recipes also need to contain all essential information required on a standardized recipe (ingredient list, weight or measurement of each ingredient, instructions, serving size, total yield, etc.). The recipe for the Grilled Chicken Salad (served on 12/07/23 at Central Heights MS) from the menu planning software states to add 1 oz of cheese. The recipe on-site at the MS states 2 oz, and is missing the serving size, total recipe yield, and the meal component contribution. Please review the standardized recipes used at each school and develop a system to ensure recipes accurately reflect current practices and products in each kitchen, and also correctly list the meal component contribution per serving.

In addition, several recipes provided for the menu served during the week of review were missing procedures for preparation. Please update the following standardized recipes to include detailed step-by-step instructions:

- Crispy Chicken Salad
- Spicy Chicken Patty Salad
- Garden Salad w/ Egg & Cheese
- Grilled Chicken Salad
- PB & J Sack Lunch
- Salad Bowl

For more information on what essential information must be on a standardized recipe, review the <u>Standardized</u> <u>Recipes in a Nutshell</u> document (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipes-in-a-nutshell.pdf).

### Comments

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**Salad Bar Signage:** When vegetables on a salad bar are being used to meet the daily and weekly vegetable requirements, portion sizes of at least 1/8cup should be communicated to students with signage. Salad bar signage templates can be found on our <u>signage webpage</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx). Please add signage to your salad bars at all schools within the district that communicates the planned portion size based on the salad bar production records.

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Crediting Documentation: Crediting documentation must be available on-site at each location within the school district. Currently, meal component contribution charts are sent to each site, but these do not include the child nutrition (CN) labels, product formulation statements (PFS), or USDA product information sheets for menu items. Schools may have a physical binder at each site that includes copies of the crediting documentation, or access to a

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digital folder that includes the files. Crediting documentation should be reviewed and updated at least twice per year, and as any new products are purchased.

#### **Comments**

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Federal civil rights legislation, including Section 504 of the Rehabilitation Act of 1973, IDEA, and Titles II and III of the ADA, requires that in providing nonacademic services, including meals, school districts must ensure children with disabilities participate along with children without disabilities to the maximum extent appropriate. Under some circumstances it may be appropriate for children with certain disabilities to eat in a separate area. However, this can only be done if it is in the best interest of the student and not for convenience purposes.

Even if the school is operating under OVS, the adult picking up the meal should not choose the components for the student. It is acceptable for the adult to ask the student to choose their meal based on the daily menu, prior to picking up the meal. It is also acceptable for the adult to take all components on a tray and then have the student select the items they would like to have on their own tray.

In addition, there must be a system in place to count the meal at the point of service when the student receives a reimbursable meal. A checklist in the classroom with the student's name and the components they selected is acceptable. In the event the meal is partially or completely rejected, other students/adults cannot consume any part of the meal.

#### Comments

Created By

**Created Date** 

**Preschool Meal Pattern; Cereal Sugar Limit:** The infant and preschool meal patterns require cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. For more information, including the sugar limit charts, the calculation formula, and cereals that meet the sugar requirements, please refer to the <u>Infants and Preschool in NSLP and SBP</u> webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

#### **Comments**

**Created By** 

**Created Date** 

**Preschool Meal Pattern; Grain-Based Desserts:** Grain-based desserts are not creditable toward the grains component under the preschool meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. For a complete list of foods considered to be grain-based desserts, please refer to the <u>Grain-Based Desserts resource</u>. (https://www.fns.usda.gov/tn/grain-based-desserts-cacfp).

#### **Comments**

**Created By** 

**Created Date** 

Breakfast Signage: Breakfast signage was posted at Meadow View Elementary, however it did not specify how to count each food item under Offer versus Serve (OVS), nor did it communicate what students can select from the available options. Technical assistance was provided and signage was correctly updated prior to meal service. Reminder, the menu planner must determine in advance whether items crediting as 2 oz eq grain count as one or two food items. For example, the large cereal bowls served on the day of observation were 2 oz eq grain, so they could be counted as either one or two food items. Adequate signage helps ensure that students accurately select reimbursable meals. Signage was available at all three sites; however, it is recommended to reposition the breakfast and lunch signage at West High School and Central Heights Middle School to be closer to the meal service area.

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Students are carrying items in their pockets while approaching POS. Please work with students to keep all items out and visible until they are entered into the POS system.				
Comments				
	Created By	Created Date		
Indicate serving size on ASP production records and ensure the fruit	t component serving size is 3	3/4 cup.		