

Administrative Review Report

Princeton School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/20/2023	01/08/2024
On-Site Review	01/08/2024	01/08/2024
Site Selection Worksheet	11/20/2023	11/20/2023
Entrance Conference	11/28/2023	11/28/2023
Exit Conference	01/22/2024	01/22/2024

Commendations:

From Public Health Nutritionist:

Thank you to all staff at Princeton School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. The Food Service Director was very receptive to the reviewer's suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your students!

From the Nutrition Program Consultant:

Princeton School District has an exemplary Local Wellness Policy which goes beyond the requirements to incorporate wellness ideas and activities throughout the school day and school community. Offering breakfast after the bell for high school students from a grab and go cart is a great way to meet student's needs and has increased their participation in breakfast, too. Nice work! Thank you for offering students the salad bar of freshly prepared fruits and vegetables - it is appealing and well used by students! The Food Service Director does a very good job of maintaining program documentation. The superintendent and kitchen staff are engaged, professional, and clearly interested in improving the child nutrition programs for the benefit of the students.

Administrative Review Report

Princeton School District

Findings and Corrective Action:

Site Name	
Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	CAP Submitted
Corrective Action History	<p>Finding: The SFA is allowing students receiving second entrees to indicate at the POS their own purchase by writing down their first name on a piece of paper. The POS for all meals and snacks must be administered by an adult.</p> <p>Corrective Action: Submit a statement that only adults will indicate purchases of meals, milk and a la carte items at the POS by writing a student's first and last name.</p>
Site Name	
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
Question #	700
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: This is a repeat finding from the previous SY17/18 Administrative Review. On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). The SFA reported no food or labor expenses for non-program foods and no expenses in any category for Wisconsin School Day Milk Program despite reporting revenue in these program lines.</p> <p>Corrective Action 1: Have the CESA 5 accounting employee review the Annual Financial Report webcast on the DPI website. Upload this individual's certificate of completion into SNACS.</p> <p>Corrective Action 2: Print a copy of the 2022-23 Annual Financial Report and notate the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS. Once approved, the report will need to be updated in the online portal. If after December 31, 2023 the DPI accountant will make the adjustments in the system.</p>
Site Name	
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
Question #	777
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>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 tracking</p>

Administrative Review Report

Princeton School District

	<p>the use of funds for milk purchases, however the funds are used on unallowable costs: all milks purchased including those used in WSDMP rather than milks served only in NSLP and SBP.</p> <p>Corrective Action 1: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for.</p> <p>Corrective Action 2: Upload a revised SCA tracking spreadsheet based on milks served in qualifying programs only.</p>
Site Name	
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	709
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding 1: This is a repeat finding from the previous SY17/18 Administrative Review. SFA did not complete the DPI Nonprogram Foods Revenue Tool in SY 22/23 or in SY 23/24 to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p>Finding 2: The SFA is allowing students purchasing a second entrée to receive other meal components at the same time at no additional cost. These foods combined do not meet the nonprogram foods ratio requirements.</p> <p>Corrective Action 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year.</p> <p>Corrective Action 2: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.</p>
Site Name	
Form Name	Civil Rights (800 - 807)
Question #	803
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Findings: This is a repeat finding from the SY17/18 Administrative Review. The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action 1: 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.</p> <p>Corrective Action 2: Identify a centralized location within the district where this procedure can be referenced and updated as needed by all staff with any responsibilities related to the Child Nutrition Programs.</p>

Administrative Review Report

Princeton School District

Site Name	
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Question #	1601
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP). This outreach is required for all SFAs participating in NSLP whether or not the school site offers summer meals.</p> <p>Corrective Action: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials. See the TA section of this report for SFSP outreach tools that USDA requires.</p>
Site Name	
Form Name	Civil Rights (809 - 810)
Question #	810
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The correct non-discrimination statement was not included on all program materials. Local Wellness Policy did not include the nondiscrimination statement.</p> <p>Corrective Action: Update program materials to include the correct 2022 version of the non-discrimination statement. Upload into SNACS a copy of updated district food services policy, which includes the correct nondiscrimination statement.</p>
Site Name	
Form Name	Professional Standards (1210 - 1219)
Question #	1216
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The school nutrition program staff did not track completed 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).</p> <p>Corrective Action 1: Review the School Nutrition Team Professional Standards webpage for 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.</p>

Administrative Review Report

Princeton School District

	Corrective Action 2: Upload a training tracker denoting all training completed to date for both the Food Service Director and the full-time school nutrition employee for school year 23-24.
Site Name	
Form Name	Professional Standards (1210 - 1219)
Question #	1219
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Non-school nutrition staff, including staff who take the meal counts at the POS and have responsibilities for the school nutrition programs did not receive job specific training in the current school year (7 CFR 210.30).</p> <p>Corrective Action: These non-school nutrition staff will take DPI's Point of Service training, Offer vs. Serve, and Civil Rights trainings. Either upload a signed roster for each topic's group training, including each employee; or, if done individually, a certificate of completion received via email from DPI for each individual employee, for each training.</p>
Site Name	Princeton School
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	CAP Submitted
Corrective Action History	<p>Finding: The meal counting and claiming system may not result in accurate meal counts by eligibility (7 CFR 210.7). Breakfast meal counts for the 4K were not taken as the student received their reimbursable meal.</p> <p>Corrective Action: Correct the meal counting process to ensure meals are tracked as the student receives their meal. Submit a statement which describes the changes made to ensure the 4K students select their breakfast and are counted as they receive it, and that the SFA is following the correct meal pattern and serve model.</p>
Site Name	Princeton School
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	401
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	CAP Accepted
Corrective Action History	<p>Finding: 4 non-reimbursable meals were observed during lunch service on the day of review (1/8/24). The meals did not contain the required ½ cup fruit, vegetable, or combination under Offer versus Serve. It is important to communicate serving sizes with the person in charge of checking</p>

Administrative Review Report

Princeton School District

	<p>off reimbursable meals.</p> <p>Corrective Action: Submit a statement which indicates understanding that students must select three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Additionally, in this statement explain how this error will be corrected and avoided in the future.</p>
Site Name	Princeton School
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	404
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Signage was not posted on the salad bar to show students what makes up a serving size. Using the vegetables on the 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).</p> <p>Corrective Action: Submit a picture of completed signage posted on the salad bar.</p>
Site Name	Princeton School
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	406
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	CAP Accepted
Corrective Action History	<p>Finding: The preschool students were served theK-8 meal pattern at breakfast (preschool students do not eat lunch) but were not served at the same time and in the same place as the older students. Students who are not yet in kindergarten must be served the preschool meal pattern if not co-mingled with other grade groups at meals. Note that preschool students may not be served flavored milk, yogurt should not contain more than 23 grams of sugar per 6 ounces, and cereal should not contain more than 6g grams of sugar per dry ounce. Preschool students cannot be served grain-based desserts at breakfast such as granola bars, toaster pastries, sweet rolls and cookies. Additionally, offer versus serve is not an acceptable serving model; students should be served all meal components on their trays at breakfast.</p> <p>Corrective Action: Submit a statement describing the specific changes made to meal service in order to serve the preschool students the age-appropriate meal pattern.</p>

Administrative Review Report

Princeton School District

Site Name	Princeton School
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	431
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The planned/actual number of servings/quantities columns, milk usage, and leftovers were not consistently filled in daily on production records during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p>Corrective Action: Submit one full week of completed production records (breakfast, lunch and salad bar), including planned/actual number of servings and quantities, milk usage, and leftovers, recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Site Name	Princeton School
Form Name	Smart Snacks (1104 - 1107)
Question #	1104
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	CAP Accepted
Corrective Action History	<p>Finding: It was observed on the day of review that students were able to take a 2 nd entrée (at an a la carte price) but were also able to take other components at no additional cost. For example, a student was observed taking an additional chicken patty sandwich, salad, and a milk, but was only charged for the 2 nd entrée When items are sold together at one price, this bundled unit exceeds the Smart Snacks nutrient standards. Bundled foods may only be sold if the bundled unit meets the Smart Snacks general and nutrient standards.</p> <p>Corrective Action: Please submit a written statement confirming students may only take a 2nd entrée at an a la carte price and no additional menu items will be bundled with it.</p>
Site Name	Princeton School
Form Name	Wisconsin School Day Milk Program
Question #	4

Administrative Review Report

Princeton School District

TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: This is a repeat finding from the previous SY17/18 Administrative Review. Milks are being claimed based on classroom pre-orders rather than an appropriate point of service count. Point of service counts (POS) for the Wisconsin School Day Program (WSDMP) must be recorded as the students receives a milk. A "back out system" which indicates who did not take a milk, rather than who did take a milk is not allowable. Excessive overrides and corrections on classroom documents were evident.</p> <p>Corrective Action 1: Retrain staff on POS procedures. Have each classroom teacher or aide watch the Wisconsin School Day Milk Program e-learning course on the DPI website. Upload documentation to support the training that was completed and staff sign-in sheet into SNACS.</p> <p>Corrective Action 2: Determine a uniform counting system for claiming milk at the point of service. Submit a detailed statement outlining how the school has changed the counting procedures and records to be used.</p> <p>Corrective Action 3: After completing corrective actions 1 and 2, provide two weeks of WSDMP counts using the corrected counting system. Upload into SNACS.</p>
Site Name	Princeton School
Form Name	Wisconsin School Day Milk Program
Question #	6
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Juice is not offered as a substitute for milk for any student in the Wisconsin School Day Milk Program (WSDMP) that has a allergy, metabolic disorder or other condition that prohibits him/her from drinking milk.</p> <p>Corrective Action 1: Provide a statement of understanding that juice is the only substitute for milk that can be claimed for reimbursement under the WSDMP. No other milk substitute can be claimed for reimbursement in this program.</p> <p>Corrective Action 2: Upload documentation of the way you (will) inform families about the WSDMP that includes information about requesting juice as a milk substitute.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
01/23/2024	4103		Administrative Review		All School staff and Superintendent

Comments

Point of Service (POS) Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record, and claim the number of meals actually served to students by category, i.e., paid, reduced-price, and free. Additionally, the number of meals served free and reduced-price and claimed for reimbursement must have adequate documentation on file to support the claim.

Administrative Review Report

Princeton School District

To do this, any school food service meal counting and claiming system must contain ALL of the basic elements listed below:

- Eligibility documentation
- Collection procedures
- Point of service meal counts
- Reports
- Claim for reimbursement
- Internal controls.

Collection procedures refer to all the steps within the meal count system involved in paying for meals and issuing and collecting the medium of exchange. A medium of exchange is defined as cash or any type of ticket, token, ID, name, or number which eligible students exchange to obtain a meal. Collection often occurs simultaneously with meal counting. With a ticket or token system, the ticket or token is presented by the student to the food service staff to obtain a meal. All tickets are tallied after the meal service to provide the count. The same payment options must be available to all students regardless of eligibility category. For instance, if students eligible for paid meals have the option to pay on a weekly or daily basis, students eligible for reduced-price meals must also have this option. All meals served in the National school Lunch and School Breakfast Program and counted for reimbursement must meet the meal pattern requirements as specified in the program regulations and be served to eligible students. 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.
- 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.

01/23/2024	4094		Administrative Review	Bookkeeper		
Comments						
SCA funds - Note that Supply Chain Assistance (SCA) funds cannot be used on milk served in the Wisconsin School Day Milk Program (WSDMP or WMMP) which is a state program. To accurately account for only NSLP and SBP program milks being used for SCA funds the unit price of a milk (from a specific invoice) should be multiplied by the number of meals served within each program each day and the total subtracted from remaining SCA funds. Subtracting an entire milk invoice without regard to whether the milks were nonprogram foods or WSDMP milks is unallowable.						
01/23/2024	4093		Administrative Review	Authorized Representative		
Comments						
Non-discrimination statement - The Local Wellness Policy (LWP) should have the current non-discrimination statement included. When the LWP is next reviewed or revised, please attach the full program non-discrimination statement.						
01/23/2024	4092		Administrative Review	FSD		
Comments						
Time as Public Health Control • Time/temperature control for safety (TCS) foods may be held without temperature control if specific conditions are met under a practice called "Time as a Public Health Control." • To utilize "Time as a Public Health Control," the school must have a corresponding SOP in the site-specific food safety plan. Template SOPs are available on the SNT Food Safety webpage. • If any TCS food is held without temperature control during service, including TCS foods on garden bars, all leftover TCS food must be discarded. • Please refer to the Wisconsin Food Code Fact Sheet: Time as a Public Health Control for detailed procedures. TCS foods include: <ul style="list-style-type: none"> o Milk and dairy products o Shell eggs o Meat (beef, pork, and lamb) 						

Administrative Review Report

Princeton School District

<ul style="list-style-type: none"> o Poultry o Fish o Shellfish and crustaceans o Baked potatoes o Heat-treated plant food, such as cooked rice, beans, and vegetables o Tofu and other soy protein o Sprouts and seeds sprouts o Sliced melons o Cut tomatoes o Cut leafy greens o Untreated garlic-and-oil mixtures o Synthetic ingredients, such as textured soy o Protein in meat alternatives 					
<p>The SFA appears to be using time as a temperature control for some food items but specifically does not use this SOP within the Food Safety/HACCP manual. Please consider whether the TCS foods included in breakfast meals and milk service would be more safely handled using time as a temperature control. For more information or instruction contact your local sanitarian.</p>					
01/23/2024	4091		Administrative Review		Determining Official, Claim Preparer
Comments					
<p>Verification - CEP districts are required to submit the Verification Collection Report (VCR) through online services by February 1st each year, although they are exempt from the Verification process itself. For assistance with submitting the VCR please contact your AR consultant or contract consultant.</p>					
01/23/2024	4090		Administrative Review		Claim Preparer
Comments					
<p>CEP schools are required to do an edit check of meal counts prior to submitting the monthly claim. The SFA can use the CEP Edit Check form or another method which compares daily totals to attendance:https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/cep-editcheck.xlsx. This practice should involve documenting the edit check work and keeping that documentation with the monthly claim file for 3 years plus the current year.</p>					
01/23/2024	4089		Administrative Review		AR
Comments					
<p>For a template of a complaint procedure which you should tailor to your school district please see our DPI SNT Civil Rights webpage:https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#complaints. The procedure should include the following:</p> <ol style="list-style-type: none"> 1. Document the complaint. USDA Program Discrimination Complaint Form (Espanol) 2. Submit complaints within five days of receiving the complaint to: Wisconsin Department of Public Instructions (DPI) Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 Fax: (608) 267-0363 Email: jessica.sharkus@dpi.wi.gov 3. Maintain a separate Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members who have a legitimate need to know. Civil Rights Complaint Log 					
01/08/2024	3993	431	Administrative Review	Princeton School	FSD
Comments					
<p>TA was provided that milk should be counted prior to meal service and again after meal service to accurately identify milk usage.</p>					
01/08/2024	3992	406	Administrative Review	Princeton School	FSD
Comments					
<p>Preschool Meal Pattern in a Nutshell: chrome-extension://efaidnbmninnibpcjpcglclefindmkaj/https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/preschool-meal-pattern-in-a-nutshell.pdf</p>					

Administrative Review Report

Princeton School District

01/08/2024	3991	434	Administrative Review	Princeton School	FSD			
Comments								
Standardized recipes are required for all menu items that have more than one ingredient (e.g., peanut butter and jelly sandwich, mashed potatoes, refried beans). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).								
01/08/2024	3990	403	Administrative Review	Princeton School	FSD			
Comments								
The printed menu should list all components included with the reimbursable meal. Currently, the menu states, "Milk is included with breakfast and lunch." The menu should be updated to reflect that a milk variety is offered daily such as, "A variety of milk is included with breakfast and lunch."								
01/08/2024	3989	404	Administrative Review	Princeton School	FSD			
Comments								
Using the vegetables on the 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).								
01/08/2024	3988	433	Administrative Review	Princeton School	FSD			
Comments								
Proper crediting documentation was not readily available for turkey breakfast sausage. Processed foods that are not listed in the USDA Food Buying Guide must have a product formulation statement (PFS), Child Nutrition (CN) label, or USDA Product Information Sheet to document meal component crediting. A PFS was obtained from Jennie-O; TA was provided to FSD on how to obtain crediting documentation directly from the manufacturer when distributor cannot provide acceptable documentation.								
01/08/2024	3987	431	Administrative Review	Princeton School	FSD			n
Comments								
Be specific on production records about the identity, brand, portion size, and description of items served. Instead of "juice box", list "Very Berry juice box" to clearly indicate what was served. Be sure to include vegetable subgroup crediting on salad bar production records. Currently there are serving sizes listed, but the vegetable subgroup is not indicated.								