

**USDA Child Nutrition Programs  
Administrative Review Summary Report**

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**School Food Authority: Prentice House**

**Agency Code: 29164**

**School(s) Reviewed: Prentice House I and III**

**Review Date(s): July 30, 2019**

**Date of Exit Conference: July 30, 2019**

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Prentice House for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. Everyone was very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Meal Counting and Claiming

##### Commendations/Comments/Technical Assistance/Compliance Reminders

- The meal counting and claim for the Review Month was conducted perfectly. There are no findings in this area of the review. The agency is to be commended for your management of these regulations.

### 2. MEAL PATTERN AND NUTRITIONAL QUALITY

##### Commendations/Comments/Technical Assistance/Compliance Reminders

- The USDA food buying guide for child nutrition programs contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the food buying guide (FBG).
- Please see the [1/2 cup fruit and vegetable reference sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) to credit various fresh produce (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>).
- Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich). They must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes at your foodservice operation. Instructions and templates can be found on the [Standardized Recipes webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).
- Ensure that students have access to 1 cup of vegetables at lunch. During the day of observation, carrots were packaged into ½ cup bags. Students were allowed to take multiple bags. Please continue making students aware that they may select multiple ½ cup portions of fruits or vegetables.
- ½ cup of creditable raisins is equal to 1.33 ounces by weight. Raisins offered during the day of observation were 1 ounce by weight. However, fruit cups (1/2 cup) and bananas (1/2 cup fruit) were also offered, and therefore satisfied the daily fruit minimum requirement (1 cup). If attempting to credit raisins as 1/2 cup fruit, please offer minimum 1.33 ounce portions.
- A variety of milk, at least two allowable milk types, is required to be offered daily at lunch and breakfast. Allowable milk types in Child Nutrition Programs include fat-free (skim) and low-fat (1 percent) flavored and unflavored milk. 2 percent milk cannot be offered at breakfast or lunch. Limit milk offering to 1 cup per student per breakfast.
- Vegetables are credited by volume (cup, fluid ounces, etc.), not weight (ounces, pounds, etc.).
- Crediting information for [USDA Brown Box](https://www.fns.usda.gov/search?keywords=NSLP+USDA+Foods+Product+Information+Sheets) and [WI State Processed products](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1920.pdf) are available (<https://www.fns.usda.gov/search?keywords=NSLP+USDA+Foods+Product+Information+Sheets>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1920.pdf>)
- Any item labeled with the wording "imitation" cheese or cheese "product" does not meet the requirements for use in food-based menu planning approaches and are not creditable toward meal pattern.
- 3 slices of ham (28g ea) credit as 2.25 oz eq M/MA.

- The whole-grain hamburger bun is 49 g (1.75 oz eq). In combination with the chicken patty (1 oz eq grain) the daily grain requirement is met. A bun alone would not meet the daily requirement.
- Prentice House has a grade-grouping waiver. All students follow the 9-12 grade meal pattern.
- Please keep a copy of completed non-domestic documentation for products found in inventory. See the suggested [Buy American - Non Compliant Product List template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).
- Signage examples can be found on our [Signage web page](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

### **Findings and Corrective Action Needed: Meal Pattern**

**❑ Finding:** Imitation processed cheese product does not credit as M/MA. The only creditable M/MA offered on 6/8 was 1.5 oz (1 oz eq) peanut butter. Lunch meal pattern requires 2 oz eq M/MA to be offered daily. Daily M/MA shortage on 6/8.

**Corrective Action Needed:** Submit a statement explaining how this daily M/MA shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.

**❑ Finding:** Meal Components and Quantities

**Corrective Action Needed:** Submit the recipe for pancakes offered on 6/9. Include nutrition fact labels for all ingredients. Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance. Until that time, the administrative review cannot be closed. Additional errors may require additional corrective action and may also be subject to fiscal action.

**❑ Finding:** Meal Pattern Shortage

**Corrective Action Needed:** Corrective Action: completed on-site, no further action needed. FSD will offer ½ cup corn in addition to 1 cup lettuce and tomatoes on upcoming taco days (day #7, menu #13).

## **3. RESOURCE MANAGEMENT**

### **Nonprofit School Food Service Account**

#### **Technical Assistance**

##### **Annual Financial Report (AFR):**

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.

- “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
- Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
- Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.

#### Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

#### Commendations/Comments/Technical Assistance/Compliance Reminders

- It is a reminder to ensure the [Civil Rights self-assessment](https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights) form be on file in the SFA on or before Oct. 31 each year (<https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights>).

### On-site Monitoring

#### Findings and Corrective Action Needed: On-site Monitoring

**Finding:** SFA did not complete onsite monitoring for each serving site. USDA regulations require that schools and RCCIs with more than one serving site conduct annual onsite monitoring to ensure compliance with counting, claiming and point of service (POS) procedures. Monitoring must be completed and on file at the SFA by February 1 annually.

**Corrective Action Needed:** Conduct and submit onsite monitoring forms for Prentice House I, II, and III. Submit the [onsite monitoring forms](https://dpi.wi.gov/search/google/onsite%20monitoring) as part of the corrective action response (<https://dpi.wi.gov/search/google/onsite%20monitoring>).

### Local Wellness Policy

#### Commendations/Comments/Technical Assistance/Compliance Reminders

The wellness policy 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 of 2010 (HHFKA). It requires each LEA participating in the National School Lunch Program and/or School Breakfast Program to develop a wellness policy. The final rule expands the requirements to strengthen policies and increase transparency. The responsibility for developing, implementing, and evaluating a wellness policy is

placed at the local level, so the unique needs of each school under the LEA's jurisdiction can be addressed. Requirements for the local wellness policy include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

The [Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) is a valuable tool to assist schools in developing policies that meet the criteria set forth in the final rule (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>). Additionally the [Wellness Policy Builder tool](https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1) is a terrific resource for schools to use to ensure compliance with wellness policy regulations (<https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1>).

### **Findings and Corrective Action Needed: Local Wellness Policy**

No corrective Action required. Thank you for working through the Wellness Policy Checklist to create a policy that addresses student needs at Prentice House.

### **Professional Standards**

### **Technical Assistance/Compliance Reminders**

### **Professional Standards: Training Requirements**

- Annual 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.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template-tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- Technical assistance was provided during the onsite visit on the new [USDA Professional Standards tracking tool](https://pstrainingtracker.fns.usda.gov/) (<https://pstrainingtracker.fns.usda.gov/>).

### **Findings and Corrective Action Needed: Professional Standards**

❑ **Finding:** Professional standards training is not being tracked according to USDA regulations. The SFA is doing a great job of providing training for staff but it has not been tracked.

**Corrective Action Needed :** Submit a training tracker that includes employee name, date of hire, position, date of training with training codes.

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Afterschool Snack Program**

#### **Commendations/Comments/Technical Assistance/Compliance Reminders**

The SFA does not currently participate in the [Afterschool Snack Program](https://dpi.wi.gov/school-nutrition/programs/afterschool-snack) (<https://dpi.wi.gov/school-nutrition/programs/afterschool-snack>). During the AR it was noted that there are enrichment activities in the evening that would qualify participation in the area eligible Afterschool Snack Program. Extensive technical assistance on the Afterschool Snack Program and options for participation were provided during the onsite review. The SFA should strongly consider participating in the program when the online contract is completed and approved for school year 2019-20.

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).”



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